HOME ARP Grant Agreement Title II of the Cranston-Gonzalez National Affordable Housing Act

220382000000000			ant Number (Federal Award Identification Number (FAIN) 21-MP420217			
10 East Church Street Bethlehem, PA 18018-0000		770.2702.172	3a Tax Identification Number 246000689		3b. Unique Entity Identifier (formerly DUNS) 931513832	
		4. Appropr 861/50	ation Number 205		et Period Start and End Date 021 - 09/30/2030	
6. Previous Obligation (Enter "0" for	r initial FY allocation)				\$0	
a. Formula Funds			\$			
7. Current Transaction (+ or -)					\$1,404,987.00	
a. Administrative and Planning	Funds Available on Fe	deral Award Date	\$70,249.35			
b. Balance of Administrative and	d Planning Funds		\$140,498.70			
c. Balance of Formula Funds			\$1,194,238.95			
Revised Obligation					s	
a. Formula Funds			s			
a. Politicia Pulius						
9. Special Conditions (check applic	able box)		10. Federal Award	Date (HUD O	fficial's Signature Date)	
☐ Not applicable ☐	Attached		09/20/2021			
11. Indirect Cost Rate*			12. Period of Performance			
Administering Agency/Dept,	Indirect Cost Rate	Direct Cost Base	Date in Box #10	0 - 09/30/2030		
	_%	* 10"	lunding assistance will be	used for payme	ent of indirect costs pursuant to 2 CF	
-	%				name of the department/agency,	
-	%				te is charged per 2 § CFR 200.414), as applied. Do not include cost rates f	
_	_%		ecipients.		12/	
implementation Notice, as may be amend specifically in the program regulations or be governed by the 2 CFR part 200 requir The Grantee shall comply with requir Management (SAM) requirements in App Funds remaining in the grantee's Tree Per 31 U.S.C. 1552, the Grantee shall not 13. For the U.S. Department of HUD	CPD Notice entitled "Re- tion plan (as of the date of titule part of this Agreeme recedures issued pursua- ution of an amendment, of nivested in HOME-ARP a Grantee agrees to assum Part \$8, as well as the Hi- applicable requirements ed from time to time. Whe HOME-ARP Implemental rements, as replaced or re- ements established by the endix I to 2 CFR part 200 issury account after the en- tincur any obligations to I	quirements for the Use of Fu of HUD's approval), and this H ent. HUD's payment of funds int to 24 CFR 92,502 and the deobligate funds previously av- ctivities under the HOME-ARI- ne all of the responsibility for OME-ARP Implementation No s at 2 CFR part 200, as am- are any previous or future ame tion Notice, activities carried of enumbered by the part 200 and e Office of Management and Et, and the Federal Funding Act of of the budget period will be of the paid with such assistance a	nds in the HOME-Americal OME-ARP Grant Agreement is su HOME-ARP Implementation Notice as environmental review, decitice, ended, that are incorporationents to 2 CFR part 20 ut under the grant after the tendments, and the tendments, and the tendments of the tendments of the tendments of the tendments of the tendments.	in Rescue Plan ent, form HUD- ubject to the Gra on Notice. To the out the Grantee re repayable in a sisten making, a sited by the pro 0 replace or ren e effective date the Universal Ni noy Act (FFATA) at available for o Period.	Program" (HOME-ARP Implementation of the authorized by HUD's electrone extent authorized by HUD regulations execution of the amendment or off accordance with the requirements of the actions, as specified and required agram regulations and the HOME-All umber sections of part 200 that are of of the 2 CFR part 200 amendments with the 2 CFR part 200 amendments are consistent to the 2 CFR part 200 amendments are consistent to the 2 CFR part 200 amendments are consistent to 2 CFR part 200 amendment are consistent to 2 CFR part 200 amendment are consistent are consistent to 2 CFR part 200 amendment are consistent are consiste	
Nadab O. Bynum, CPD Director 16. For the Grantee (Name and Title			17. Signature	1 /	18. Date	
Robert Donchez, May			104	PW	723/2	
19. Check one: Initial Agre	eement A	mendment #	' 1	/	/ 1	
20, Funding Information: HOI Source of Funds Appropris 2021 861/5020	4 14 17 4	<u>Amount</u> \$1,404,987.00		,		

- 21. Additional Requirements: These additional requirements are attached and incorporated into this Agreement. The Grantee agrees to these additional requirements on the use of the funds in 7., as may be amended from time to time by the Secretary.
  - a) As of the Federal Award Date, the Grantee may use up to the amount identified in 7.a. of this Agreement for eligible administrative and planning costs in accordance with the HOME-ARP Implementation Notice.
  - b) Until the date of HUD's acceptance of the Grantee's HOME-ARP allocation plan, the Grantee agrees that it will not obligate or expend any funds for non-administrative and planning costs, in accordance with the HOME-ARP Implementation Notice.
  - c) In accordance with the HOME-ARP Implementation Notice, as of the date of acceptance by HUD of the Grantee's HOME-ARP allocation plan, HUD shall make the amount identified in line 7. of this Agreement available to the Grantee.
  - d) If the Grantee does not submit a HOME-ARP allocation plan or if the Grantee's HOME-ARP allocation plan is not accepted within a reasonable period of time, as determined by HUD, the Grantee agrees that all costs incurred and HOME-ARP funds expended by the Grantee will be ineligible costs and will be repaid with non-Federal funds.

### 22. Special Conditions

#### HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing —The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

### **Anti-Lobbying** -- To the best of the jurisdiction's knowledge and belief:

- 1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
- 2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
- 3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

**HOME-ARP Certification** --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

Signature of Authorized Official

 $\frac{3/29/23}{\text{Date}}$ 

Title: Mayor, City of Bethlehem J. William Reynolds

OMB Number: 4040-0004 Expiration Date: 11/30/2025

Application for F	Federal Assistance SF-424							
*1. Type of Submission  Preapplication  Application  Changed/Corre	on:  * 2. Type of Application:  New  Continuation  * Other (Specify):  * Other (Specify):  * Other (Specify):  * Other (Specify):							
* 3. Date Received: 03/24/2023	4. Applicant Identifier;							
5a. Federal Entity Identifier:  5b. Federal Award Identifier:  M21-MP420217								
State Use Only:		-						
6. Date Received by	State: 7. State Application Identifier:							
8. APPLICANT INFO	DRMATION:							
* a. Legal Name: Ci	ity of Bethlehem	<u> </u>						
* b. Employer/Taxpay	ver Identification Number (EIN/TIN):  * c. UEI:  JUJGEKQ1V6R3							
d. Address:								
* Street1: Street2:	10 East Church Street							
* City: County/Parish:	Bethlehem							
* State: Province:	PA: Pennsylvania							
* Country:  * Zip / Postal Code:	USA: UNITED STATES 18018-6028							
e. Organizational ป	Init:							
Department Name: Community and I	Econ Development Division Name:							
f. Name and contac	et information of person to be contacted on matters involving this application:							
Prefix:  Middle Name:  G * Last Name:  Vid  Suffix:	* First Name: Robert							
Title: Housing an	nd Community Dev. Administrator	- · · · · · · · · · · · · · · · · · · ·						
l	Organizational Affiliation: City of Bethlehem							
* Telephone Number:	610-997-5731 Fax Number: 610 - 865 -	7 3 3 0						
*Email: rvidoni@	*Email: rvidoni@bethlehem-pa.gov							

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
C: City or Township Government
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
United States Department of Housing and Urban Development
11. Catalog of Federal Domestic Assistance Number:
14.239
CFDA Titte:
HOME Investment Partnerships Program
* 12. Funding Opportunity Number:
14.239
* Title:
HOME Investment Partnerships Program (HOME) American Rescue Plan - MOME-ARP
13. Competition Identification Number:
Title:
14. Areas Affected by Project (Cities, Counties, States, etc.):
Add Attachment   Delete Attachment   View Attachment
7 AM
* 15. Descriptive Title of Applicant's Project:
HOME-ARP Allocation Plan
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

Application for Federal Assistance SF-424								
16. Congressional Districts Of:								
* a. Applicant	PA-007		* b. Program/Project PA-007					
Attach an additional list of Program/Project Congressional Districts if needed.								
			Add Attachment Delete Attachment View	Attachment				
17. Proposed I	Project:							
* a. Start Date:	05/01/2023		* b. End Date: 09/30/	2030				
18. Estimated	Funding (\$):		•					
* a. Federal		1,404,987.00						
* b. Applicant		0.00						
* c. State	· · · · · · · · · · · · · · · · · · ·	0.00						
* d. Local		0.00						
* e. Other		0.00						
* f. Program Inc	come	0.00						
* g. TOTAL		1,404,987.00						
* 19. Is Applica	ation Subject to Review By	/ State Under Exe	cutive Order 12372 Process?					
a. This app	olication was made availab	le to the State und	er the Executive Order 12372 Process for review on					
b. Progran	n is subject to E.O. 12372 t	out has not been se	elected by the State for review.					
C. Progran	n is not covered by E.O. 12	372.						
* 20. Is the Ap	plicant Delinquent On Any	Federal Debt? (If	"Yes," provide explanation in attachment.)					
Yes	Yes No							
If "Yes", provid	de explanation and attach			<u> </u>				
			Add Attachment Delete Attachment View	v Attachment				
herein are tru comply with a	e, complete and accurate ny resulting terms if I acce	e to the best of n ept an award. I am	nents contained in the list of certifications** and (2) the sum of the required assurance aware that any false, fictitious, or fraudulent stateme U.S. Code, Title 18, Section 1001)	es** and agree to				
X ** I AGRE	E							
** The list of c	ertifications and assurances,	or an internet site	where you may obtain this list, is contained in the annotation	uncement or agency				
specific instruct	ions.			<u> </u>				
Authorized Re	presentative:							
Prefix:		* Firs	st Name: J. William					
Middle Name:								
* Last Name:	Reynolds							
Suffix:		]						
* Title:	ayor			- <del></del> · - • · ·				
* Telephone Number: 610-865-7100 Fax Number:								
*Email: jrey	nolds@bethlehem-pa.g	ov						
* Signature of A	* Signature of Authorized Representative:   . Will: Reyle   3/28/23							
1			*	<u> </u>				

OMB Number: 4040-0007 Expiration Date: 02/28/2025

#### ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

## PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE:

Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

- Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
- 2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to:

   (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352)
   which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education
   Amendments of 1972, as amended (20 U.S.C.§§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation

- Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U. S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
- 7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
- 10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- Will compty with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

- 13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
- 14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
- 15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE		
I With Rul	Mayor		
APPLICANT ORGANIZATION	DATE SUBMITTED		
City of Bethlehem	3/30/2023		

OMB Number: 4040-0009 Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

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NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General
  of the United States and, if appropriate, the State,
  the right to examine all records, books, papers, or
  documents related to the assistance; and will establish
  a proper accounting system in accordance with
  generally accepted accounting standards or agency
  directives.
- 3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- 5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handicaps: (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(s) which may apply to the application.

- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- 13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

- Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
- 18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
J. Willi Paye	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Bethlehem	3/30/2023

SF-424D (Rev. 7-97) Back

### **RESOLUTION NO. 2023-040**

### HOME-ARP Allocation Plan - 2021 Action Plan Substantial Amendment

WHEREAS, the U.S. Department of Housing and Urban Development ("HUD") granted the City of Bethlehem, Pennsylvania ("City") \$1,404,987 in American Rescue Plan Program funding ("HOME-ARP Grant") that may be used for the acquisition and development of a non-congregate shelter;

WHEREAS, on behalf of the City Administration, the Department of Community and Economic Development ("Administration") prepared a HOME-ARP Grant allocation plan ("Allocation Plan") that would allocate the grant funds to costs related to the future acquisition and development of a non-congregate shelter and wishes to submit such plan to HUD;

WHEREAS, in order for the Administration to submit the Allocation Plan to HUD, it must also submit a procedural Substantial Amendment ("Amendment") to the City's program year 2021 Community Development Block Grant and HOME Investment Partnerships Program Annual Action Plan ("2021 Action Plan") to assign the federal grant funds to a program year based on the legislative origin year of the funding; and

WHEREAS, the Administration prepared an Amendment to its 2021 Action Plan to enable the submission of its Allocation Plan to HUD and held a public hearing on the Amendment on February 9, 2023, and made the Amendment available for public display and comment, including without limitation at <a href="https://www.bethlehem-pa.gov">www.bethlehem-pa.gov</a>, during the following comment period: December 30, 2022, through January 29, 2023.

NOW, THEREFORE BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF BETHLEHEM:

- 1. That the Amendment, amending the City's 2021 Action Plan for the period from January 1, 2021 to December 31, 2021, and enabling submission of the HOME-ARP Allocation Plan to HUD, is hereby approved and authorized for submission.
- 2. That the Mayor is hereby authorized to provide the necessary assurances and certifications to submit the Amendment to HUD.

Sponsored by: /s/ Wandalyn J. Enix

/s/ Rachel Leon

ADOPTED by Council this 7th day of March, 2023.

/s/ Michael G. Colón President of Council

ATTEST: /s/ Tad J. Miller City Clerk

# CITY OF BETHLEHEM, PA SUBSTANTIAL AMENDMENT TO ANNUAL ACTION PLAN

# (HUD Program Year 2021) HUD ENTITLEMENT PROGRAMS

Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME)

Jurisdiction(s): City of Bethlehem, PA

Website: https://www.bethlehem-pa.gov/

Contact Person: Robert G. Vidoni

Housing and Community Development Administrator

City of Bethlehem

Department of Community and Economic Development

10 East Church Street, Bethlehem, PA 18018

Telephone:

610-997-5731

Email:

rvidoni@bethlehem-pa.gov

The City of Bethlehem, PA (City), is a federal entitlement community that receives annual allocations of Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds from the U.S. Department of Housing and Urban Development (HUD). The City is required to prepare an Annual Action Plan detailing the uses of entitlement funds to meet its affordable housing and community development goals as outlined in its Consolidated Plan.

According to 24 CFR 91.505 and the City's Citizen Participation Plan, the City of Bethlehem has determined that the following actions will require a substantial amendment:

 In response to the Coronavirus 2019 (COVID-19) pandemic, the U.S. Department of Housing and Urban Development (HUD) has notified the City of Bethlehem that it will receive an allocation of \$1,404,987 to be used for community development initiatives. This allocation was authorized by the American Rescue Plan Act of 2021, Public Law 117-2, which was signed into law on March 11, 2021, to respond to the growing effects of this unprecedented public health crisis.

As the City of Bethlehem will receive HOME - ARP funds, a Substantial Amendment to the Program Year 2021 Annual Action Plan is necessary. In accordance with HUD guidance, the City is providing no less than thirty (30) days for public review and comments.

The HOME – ARP funds allocated under the American Rescue Plan (ARP) may be used for a range of eligible activities, as allowed under24 CFR Part 92.2 to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability. Eligible activities include (1) Production or Preservation of Affordable Housing, (2) Tenant-Based Rental Assistance, (3) Supportive Services, Homeless Prevention Services, and Housing Counseling, and (4) Purchase and Development of Non-Congregate Shelter. As such, the City proposes the following:

SOURCE	Amount
FY2021 HOME ARP	\$1,404,987
USES	
Acquisition and	\$1,334,737
Development of Non-	
Congregate Shelters	
Administration and	\$70,250
Planning	
TOTAL	\$1,404,987

### **Proposed Substantial Amendment**

This substantial amendment request will allow the City to add the HOME ARP funding source and uses to the Program Year 2021 Annual Action Plan.

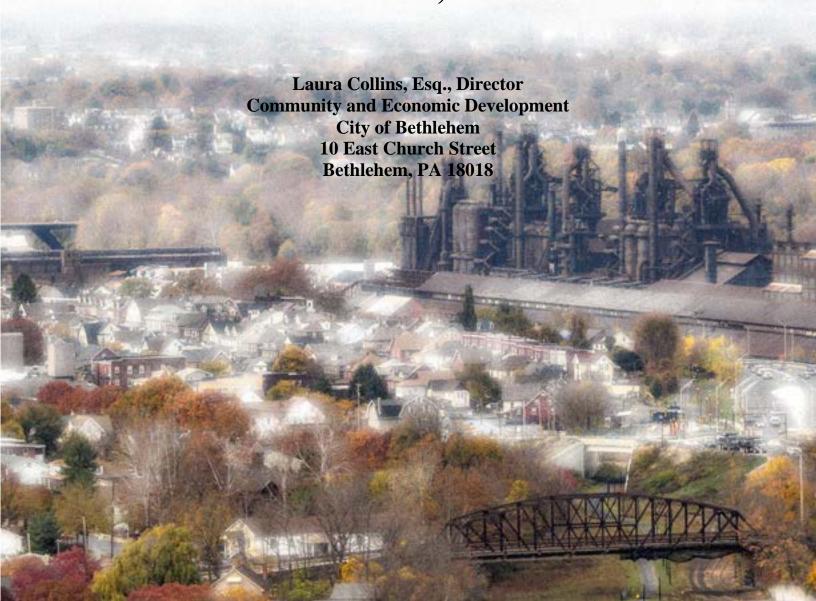
### **Public Comments; Public Hearing**

The City will address and incorporate any comments received during the thirty (30) day public commenting period between Friday, December 30, 2022, and Sunday, January 29, 2023. A public hearing on this Substantial Amendment will be scheduled in the near future. Prior to the hearing, a notice will be posted at <a href="https://www.bethlehem-pa.gov/Community-Economic-Development/CDBG-Home">https://www.bethlehem-pa.gov/Community-Economic-Development/CDBG-Home</a>. The notice will state the date, time, and location of the hearing.

# HOME-ARP ALLOCATION PLAN



March 30, 2023



### **HOME-ARP ALLOCATION PLAN**

(March 30, 2023)

### **TABLE OF CONTENTS**

Note: Page numbers match numbers on bottom of pages, not PDF digital pagination, unless indicated

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### **HOME-ARP Allocation Plan**

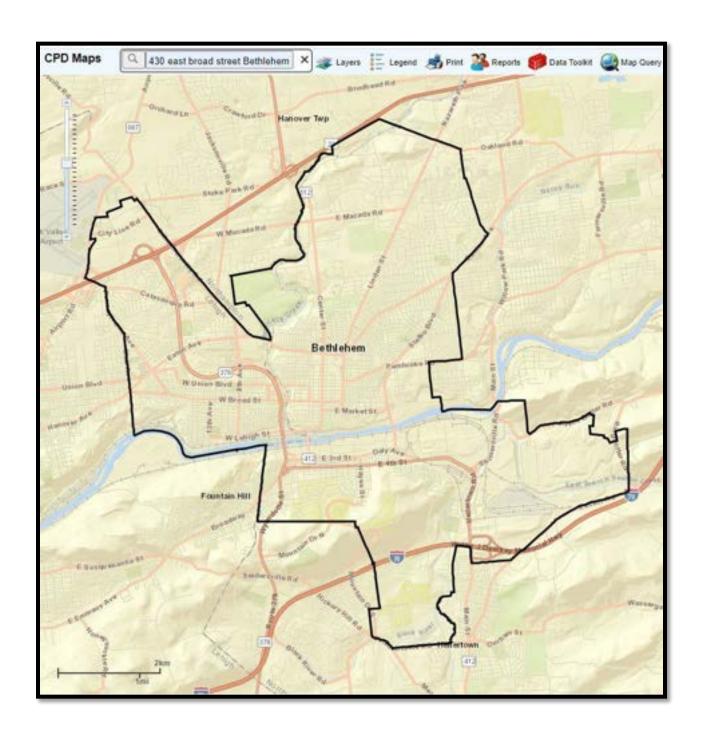
### Guidance

- To receive its HOME-ARP allocation, a PJ must:
  - o Engage in consultation with at least the required organizations;
  - o Provide for public participation including a 15-day public comment period and one public hearing, at a minimum: and,
  - o Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the "HOME-ARP allocation plan" option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
  - Affirmatively Further Fair Housing;
  - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
  - o Anti-Lobbying;
  - o Authority of Jurisdiction;
  - o Section 3; and,
  - o HOME-ARP specific certification.

Participating Jurisdiction: City of Bethlehem, PA

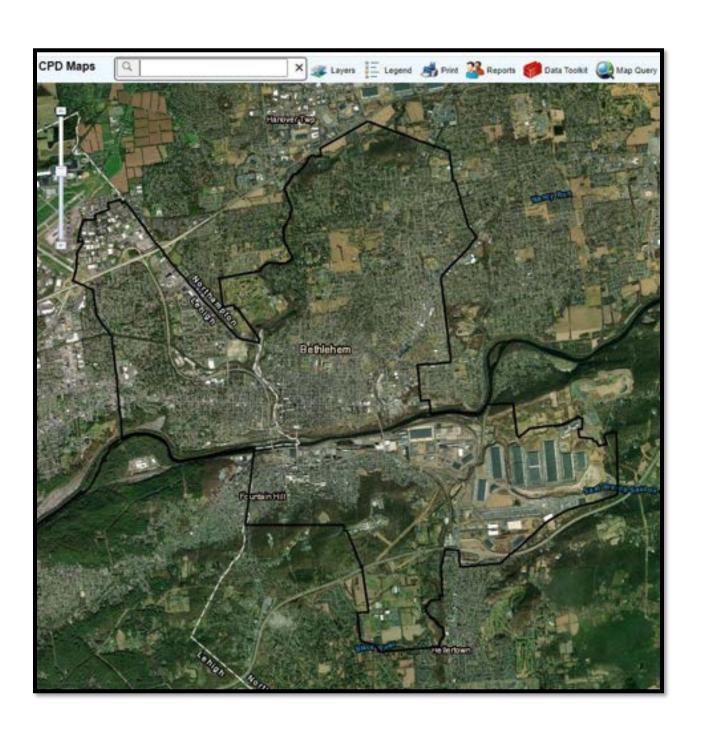
Date: 3/30/2023

# Map 1 **Geography**

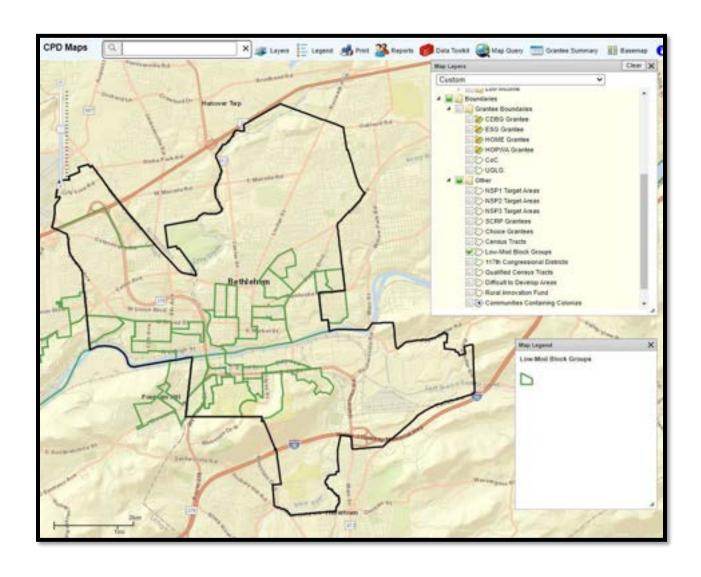


# Map 2

# Satellite



Map 3
Low- and moderate-income (LMI)
Block Groups



# Participating Jurisdiction: City of Bethlehem, PA HOME-ARP Allocation Plan

### Consultation

### List the organizations consulted, and summarize the feedback received from these entities.

	EXTERNAL CONSULTATIONS							
	Agency/Org Consulted	Type of Agency/Org	Qualifying Population Served	Method of Consultation	Summary of Feedback	Date of Consultation		
1	New Bethany Ministries	Homeless Service Provider	Homeless, At-Risk of Homelessness	In-person Interview	Expansion of physical locations for intake services are key to enhancing access to services.  Coordinated regional strategies between public sector agencies, government, and institutions are key.  Non-congregant units are viewed as a best practice.  Any year-round shelter should have access to services and public transportation.	May 23, 2022		

2	Bethlehem Emergency Sheltering	Homeless Service Provider	Homeless	In-person Interview	Immediate priority is a permanent location for the emergency shelter.  There was an observed increase in the number of those experiencing homelessness during and post-Pandemic (2021 - present).  Partnering with existing service providers is a big part of sustaining their seasonal emergency shelter.	May 31, 2022
					and post-Pandemic (2021 - present).  Partnering with existing service	
					part of sustaining their seasonal emergency shelter.	
					Non-congregate shelter is ideal.	
					Additional support and sheltering options are needed for families experiencing homelessness.	

3	Lehigh Conference of Churches	Homeless Service Provider	Homeless	Virtual Interview	Serves as a hub and access site for services making it easier to coordinate access to care.  The biggest issue right now is the affordable housing crisis, there is no safe, affordable, adequate housing.  Programming is diversified to support access to services, homelessness prevention, rental assistance, and a drop-in day-center with three meals per day.	June 1, 2022
4	Lehigh Valley Center for Independent Living	Private Agency that addresses fair Housing, civil rights, and persons with disabilities	Other Populations	Virtual Interview	Saw significant increase in number of clients as a result of COVID.  Offer intake services, housing assistance, job coaching.  Have seen an exponential increase in rents causing housing instability and an affordability crisis.  Accessible shelters and apartments are very important to the population LVCIL serves.  Day centers are very important, giving people a place to stay during the day.	May 31, 2022

5	Valley Youth	Homeless	Other	Virtual	Serves youth under	June 1, 2022
	House	Service Provider	Populations,	Interview	24 years.	
			Homeless			
					Observed a	
					significant decrease	
					in affordable housing	
					over the past few	
					years.	
					Transitional age	
					youth (18-24) can be	
					difficult to get into	
					shelter, do not	
					always feel safe.	
					Key supportive	
					services for their	
					population are access	
					to food, mental	
					health treatment,	
					acquiring	
					documentation, and	
					transportation.	
					Important qualities of	
					Important qualities of any future shelter	
					space include:	
					handicap accessible,	
					safe storage for	
					belongings,	
					wraparound services,	
					and place for pets.	

7	Turning Point	Domestic	Victims of	Virtual	Have seen significant	June 1, 2022
	Lehigh Valley	Violence Service	Domestic	Interview	increase in demand	
		Provider	Violence		for services since the	
					start of the pandemic.	
					•	
					Rapid rehousing is	
					needed, but the	
					affordable housing	
					crisis makes it	
					difficult to move	
					from the	
					organization's shelter	
					to transitional	
					housing.	
					Work with both	
					direct referrals and	
					from 2-1-1.	
					Trauma-informed	
					design for sheltering	
					survivors of domestic	
					violence.	
					Trauma-informed design for sheltering is key to serving survivors of domestic	

6	Valley Health	Homeless	Homeless	Virtual	A team of behavioral	June 1, 2022
	Partners Street	Service Provider		Interview	specialists, nursing	
	Medicine				staff, social workers,	
					and those working on	
					addiction.	
					Provide direct care	
					onsite at	
					encampments,	
					shelters, and drop-in	
					day centers.	
					Have built trust and a	
					strong reputation	
					within the	
					community of those	
					experiencing	
					homelessness,	
					allowing them to	
					effectively provide	
					services.	
					T1 C - CC1-1-1-	
					Lack of affordable housing is the largest	
					barrier to effectively	
					addressing	
					homelessness.	
					in a second seco	
					Both emergency	
					shelter and	
					permanent housing	
					are needed, not	
					everyone wants	
					permanent housing.	

veteran addressing the needs of qualifying populations	risk of homelessness	collaboration in the service provider space.  A permanent shelter is needed so can effectively begin addressing homelessness in the region.  Housing instability can be caused by rising rents and lack of affordable	
		addressing homelessness in the	
		Housing instability can be caused by rising rents and lack	

9	Lehigh Valley Regional Homeless Advisory Board (LVRHAB)	One of five RHABS that comprise the Eastern PA Continuum of Care, which encompasses 33 counties. The RHAB works to prevent and end homelessness in the Lehigh Valley.	All QPs	In-person Interview	LVRHAB is a collaboration of service providers that come together to strategize and coordinate services.  Need additional rapid rehousing, access to services, landlords to accept Section 8, and affordable units.  Work closely with the counties (Northampton and Lehigh).  Future shelter location should be close to transportation.  Consider effect of local zoning on opportunities for shelters.	June 2, 2022
10	Third Street Alliance	Homeless and Domestic Violence Service Provider	Victims of Domestic Violence, Homeless	In-person Interview	Primarily works with families.  Subscribes to a housing first model with clients being very focused on their housing plan.  Provides childcare so parents can focus on getting jobs.	June 2, 2022

11	St. Luke's University Health Network	Health network serving all populations	Homeless	Virtual Interview	Supports community health programming.  Collaborates with shelters, service providers, and dropin centers.  Region has challenges with providing attainable housing.  Future shelter locations should be close to transportation and bus routes.	June 20, 2022
12	Bethlehem Area School District (BASD)	Public Agency that addresses needs of qualifying populations	Homeless, Other Populations	In-person Interview	Utilizes Community in Schools programming to help support families who may be experiencing homelessness and housing instability.  The competitive rental market increases rents and creates housing instability affecting the district's families.  School district mobility rate (percentage of people moving schools) is quite high, ranging between 33 to 50% at local elementary schools.  Both a permanent emergency shelter and family-units are important to alleviate the homelessness crisis.	June 16, 2022

13	Eastern PA CoC Pa-509	Continuum of Care (CoC)	All QPs	Virtual Interview	Receives funding through PA Department of Community and Economic Development (DCED) for ESG funds.  The Lehigh Valley RHAB is part of the CoC.  Biggest issue for those experiencing homelessness is lack of available units.  Priority for CoC is permanent housing due to HUD funding, but emergency sheltering is important as an interim step.  Regional coordination is key.	Sept. 15, 2022
14	Battle Borne	Veterans' Group	Other Populations	Virtual Interview	Services for veterans experiencing homelessness often coordinated through the U.S. Dept. of Veterans Affairs (VA).  Importance of trauma-informed care and sheltering.  Services can sometimes be disjointed, organizations like Battle Borne help to coordinate.	Sept. 20, 2022

15	Bethlehem	Public Housing	Homeless, At-	Virtual	Currently have a	Sept. 15, 2022
	Housing	Authority	Risk of	Interview	waitlist of 2-3 years,	
	Authority		Homelessness		priority is giving to	
					domestic violence	
					victims and veterans.	
					Rely on landlords who accept Section 8 to provide affordable housing due to waitlist; however, current Section 8 vouchers do not cover market rate rents.  Not currently building new public	
					housing units, relying	
					mainly on acceptance	
					of Section 8	
					vouchers.	

16	Northampton County Human Services	Public Agency	All	Virtual Questionnaire	Receives referrals from individuals and families seeking services in housing, counseling, veterans, aging, mental health, drug and alcohol, early intervention, disabilities, children, and youth.  Funding has decreased in some of their programs, and the use of housing vouchers are limited as they only provide a certain funding cap and landlords want more for their rentals.  Big challenge is creating new public housing and new affordable housing stock. They also struggle with accessible units, long waitlists, and closing of assisted living facilities.  There definitely needs to be more shelter availability. The shelters currently in use are full and there is always a waiting list.	Feb. 15, 2023
17	Northampton County Housing Authority	Public Housing Agency	Response not received by 3/30/2023	Virtual Questionnaire	N/A	Contacted Feb. 9, 2023
18	Lehigh County Housing Authority	Public Housing Agency	Response not received by 3/30/2023	Virtual Questionnaire	N/A	Contacted Feb. 16, 2023

19	Lehigh County Department of Human Services	Public Agency	Response not received by 3/30/2023	Virtual Questionnaire	N/A	Contacted Feb. 14, 2023
20	Pennsylvania Housing Finance Agency	Public Housing Agency	Response not received by 3/30/2023	Virtual Questionnaire	N/A	Contacted March 2, 2023

INTERNAL CONSULTATIONS							
Department	Type of Agency/Org	Qualifying Population Served	Method of Consultation	Summary of Feedback	Date of Consultation		
Bethlehem Fire Department	Public Agency that addresses needs of qualifying populations	Homeless	In-person Interview	Have observed a significant increase in the City's homeless population and an increase in encampments.  Observed effectiveness of the Street Medicine team as a trusted service provider.  Current engagement with populations experiencing homelessness is mainly reactive to public safety or nuisance complaints.  City should take a regional approach to addressing homelessness.  Initiative of engaging social workers as part of response teams with Police and Fire has been viewed as successful.	May 2, 2022		

2	Bethlehem Police Department	Public Agency that addresses	Homeless, Other	In-Person interview	Working to understand how	May 2, 2022
	Department	the needs of	Populations	interview	many calls pertain to	
		qualifying populations			homeless individuals.	
		populations			Work with the Bethlehem Emergency Shelter (BES) to provide vouchers to those utilizing the shelter to ensure there are no arrest warrants.  Substance abuse and mental health are primary issues of those experiencing	
					homelessness.	
					Bethlehem Health Bureau Social Worker response program allows for enhanced response alongside police to those experiencing mental health crises.	
					Day centers and places to go during the day are very important.	
					Future site for a shelter should be walkable, offer wraparound services, and have a daytime drop-in center.	

3	<b>Bethlehem Health</b>	Public Agency	Homeless,	Virtual	There has been an	April 29, 2022
	Bureau	that addresses	Other	Interview	increase over the	
		needs of	Populations		past few decades in	
		qualifying			homelessness and	
		populations			homeless	
					encampments.	
					Mental health and	
					substance abuse are	
					substantial issues	
					among the	
					population	
					experiencing	
					homelessness.	
					Housing	
					affordability has	
					made the	
					homelessness crisis	
					more pronounced.	
					Bureau was very	
					active in working	
					with the homeless	
					population during	
					COVID (providing	
					vaccines and	
					quarantining).	
					\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
					Health Bureau	
					Social Workers are	
					beginning to co-	
					respond to mental	
					health crises	
					alongside City	
					Police Officers.	

4	<b>Bethlehem Emergency</b>	Public Agency	Homeless	In-person	Department played a	April 29, 2022
	Management	that addresses		Interview	key role in providing	
		needs of			hotel stays for	
		qualifying			homeless individual	
		populations			quarantining with	
					COVID during the	
					pandemic.	
					Homeless	
					Encampments have	
					grown in size and	
					number over the past	
					decade.	
					<b>D</b>	
					Regional	
					collaboration and	
					coordination is	
					needed and should	
					be prioritized.	
					A permanent, year-	
					round shelter will	
					greatly help the	
					service provider	
					landscape.	
	1				randscape.	

5	Bethlehem Mayor's	Public Agency	All	In-person	Homelessness is a	May 2, 2022
	Office	that addresses		Interview	regional issue	
		needs of			connected to	
		qualifying			affordability and	
		populations			housing across the	
					region that needs to	
					be addressed on a	
					regional scale.	
					Current	
					administration is	
					prioritizing long-	
					term, strategic	
					planning and	
					streamlined services.	
					The lack of	
					affordable housing	
					units is a major issue	
					that directly impacts	
					homelessness and	
					housing instability.	
					Build on	
					partnerships with	
					service providers to	
					serve Bethlehem's	
					homeless	
					population.	
					Connection to	
					services and	
					accessibility is a	
					huge part of	
					identifying sites for	
					a permanent shelter.	

6	Bethlehem Mayor's	Public Agency	All	In-person	Those experiencing	May 4, 2022
	Office Director of	that addresses		Interview	homelessness are	
	Equity and Inclusion	needs of			our neighbors and	
		qualifying			any programs,	
		populations			services, and	
					initiatives need to	
					recognize that	
					everyone is a part of	
					this community.	
					Housing and mental	
					health services are	
					key issues facing the	
					City's homeless	
					population.	
					TT ' ' 1 '1''	
					Housing instability	
					is a huge issue	
					facing Bethlehem	
					residents, especially the threat of getting	
					evicted with rising	
					rents and when a	
					property is sold.	
					property is soid.	
					A multi-site solution	
					is key for the City to	
					approach an	
					effective and	
					comprehensive	
					solution to	
					addressing	
					homelessness.	

#### **Additional Consultation Notes:**

As of March 30, 2023, the City of Bethlehem ("City") was awaiting consultation responses from Northampton County Human Services, Northampton County Housing Authority, Lehigh County Department of Human Services (DHS), and Lehigh County Housing Authority. If the City receives consultation responses following submission of this plan to HUD, it will prepare and retain summaries comparable to the other consultations in the above chart.

Victory House, a Veterans' Group serving the Homeless, At-Risk of Homelessness, and Other Populations, declined to participate in outreach for this plan on May 24, 2022.

The Eastern Pa Continuum of Care (CoC) is a regional collaborative of organizations across 33 counties to advance efforts to end homelessness. The large geographic area is carved into five Regional Homeless Advisory Boards, which meet monthly to locally prevent and address homelessness. This includes the Lehigh

Valley Regional Homeless Advisory Board (LVRHAB), which represents Lehigh and Northampton counties and its three cities, Allentown, Bethlehem, and Easton. A City of Bethlehem representative serves on the LVRHAB governing board. The LVRHAB connects regional organizations to the resources provided by the full Eastern Pa CoC. The LVRHAB applies for federal grants for the region to support homeless, housing, and supportive services. The Eastern Pa CoC's responsibilities include ensuring stakeholder representation, setting meeting agendas, conducting the Point-in-Time Counts, overseeing subcommittees and working groups, and helping to review programs, activities, and data. Currently, a vast majority of CoC funding goes towards Permanent Supportive Housing and Rapid Rehousing.

## **Consultations Summary Summarize the consultation process:**

The City conducted internal and external stakeholder interviews to understand the current services available for those experiencing and at-risk of homelessness in Bethlehem and to identify potential improvements to sheltering and housing options. The process provided helpful insights and clarification on current issues, needs, and options for the qualifying populations throughout the City and region.

Summaries of the consultation results are presented in the above charts along with consultation dates. Where the City did not receive a response to a consultation request, the consultation date is the date of the outgoing consultation request communication.

The consultation interviewees were identified by staff from the City's Department of Community and Economic Development (DCED) and included the following internal (City) and external individuals, agencies, and organizations:

#### EXTERNAL CONSULTATIONS

- 1. New Bethany Ministries
- 2. Bethlehem Emergency Sheltering
- 3. Lehigh Conference of Churches
- 4. Lehigh Valley Center for Independent Living
- 5. Valley Youth House
- 6. Turning Point Lehigh Valley
- 7. Valley Health Partners Street Medicine Bethlehem
- 8. City Councilperson Rachel Leon
- 9. Lehigh Valley Regional Homeless Advisory Board (LVRHAB)
- 10. Third Street Alliance
- 11. St. Luke's University Health Network
- 12. Bethlehem Area School District
- 13. Eastern PA Continuum of Care
- 14. Battle Borne
- 15. Bethlehem Housing Authority (BHA)
- 16. Northampton County Human Services
- 17. Northampton County Housing Authority
- 18. Lehigh County Housing Authority
- 19. Lehigh County Department of Human Services
- 20. Pennsylvania Housing Finance Agency

#### INTERNAL CONSULTATIONS

- 1. Bethlehem Fire Department
- 2. Bethlehem Police Department
- 3. Bethlehem Health Bureau
- 4. Bethlehem Emergency Management
- 5. Bethlehem Mayor's Office
- 6. Bethlehem Mayor's Office Director of Equity and Inclusion

Each consultation centered around a standard set of interview questions, designed to understand current service provisions for qualifying populations, and identify potential needs and gaps for qualifying populations. These consultations were wide-ranging discussions, not only understanding each organization's role, but also expanding beyond each organization's purview to best understand current context within the City and larger Lehigh Valley region. This set of questions can be found attached in the appendix. See **Appendix 1** (**Consultation Questions**).

The interview findings highlight key issues stakeholders have observed in their experiences with the unsheltered population, experiences with local housing supply, and their ideas for potential solutions.

#### **Summary by Qualifying Population:**

1. Homeless as defined in 24 CFR 91.5

#### There is a lack of concrete solutions to support the area's chronically homeless population.

There are not long-term solutions and/or specific programs to assist the population identified as 'chronically homeless' (an individual with a disability who has been experiencing homelessness for at least one year or repeatedly, as defined by HUD), according to service providers.

Many chronically homeless individuals live in encampments, although some do rely on emergency shelters in the winter, providers report. Valley Health Partners Street Medicine offers essential medical services to the chronically-homeless population, but the Lehigh Valley's pipeline of care still lacks a long-term sheltering and/or housing solution for these individuals.

Some service providers support the idea of "tiny homes" to shelter the chronically homeless population.

#### The City's unsheltered population has grown and originates from more varied geographies.

Homelessness knows no geographic boundaries. The person staying in a Bethlehem emergency shelter tonight may have spent their day in a drop-in shelter in Allentown or accessing services in Easton. The unsheltered population across the Lehigh Valley, including in Bethlehem, has grown in recent years, a trend the COVID-19 pandemic exacerbated. The surging local real estate market and limited affordable housing options compounds local housing instability, resulting in more individuals and families who are housing instable and/or experiencing homelessness.

This is most acutely highlighted among Bethlehem Area School District families. The district reports a 53% increase in homelessness (414 children) over the last two years as families struggled to keep up with rising costs and navigate pandemic-related job issues. Housing instability became such a huge issue, the school

district partnered with New Bethany Ministries and United Way of the Greater Lehigh Valley to bring housing navigators into its highest need schools. Navigators help connect families with financial programs, such as Emergency Rental Assistance Programs, and act as a liaison between landlords and tenants.

## There is a recognized perception of the 'stigma' of homelessness and the way it affects how people view themselves and how they are treated by the community.

Service providers emphasized that there is an existing cultural 'stigma' of being homeless and that this stigma greatly affects one's perception of self and sense of dignity. The ways in which systems, services, and the larger community treat those experiencing homelessness is dehumanizing and takes everything out of their control (i.e., relying on waitlists for services/housing).

The Lehigh Valley community, service providers, and institutions should prioritize treating those experiencing homelessness as neighbors in crisis as opposed to treating them as others. Experiencing homelessness can be a traumatic process that leaves people feeling voiceless and out of control.

## Historically, the closing of the Allentown State Hospital increased the area's overall unsheltered population. There's been an uptick in those experiencing homelessness due to the COVID-19 pandemic and the region's affordability crisis.

Service providers and unsheltered individuals point to the 2010 closure of the Allentown State Hospital as one of the drivers of the Lehigh Valley's increasing homeless population.

During the consultations, some unsheltered individuals shared that the Allentown State Hospital was the last 'home' they knew.

Since the start of the pandemic, the population of those experiencing homelessness has jumped significantly, a trajectory that is expected to continue amid the region's affordable housing crisis and lack of inventory. Service providers report larger populations coming from wider geographic areas, as well as a rise in individuals and families experiencing homelessness due to domestic violence.

## Within the City of Bethlehem there is a portion of the unsheltered population who do not cross the bridges for services, making service provision on both the North and South sides essential.

The City is bisected by the Lehigh River and has three bridges traversing it. A Bethlehem-based service provider shared that while the majority (around 60%) of the unsheltered population in the City will utilize services on both sides of the bridges, about 40% will only access services where they are based (either North or South sides). This highlights the need for services on both the North and South sides to ensure adequate service provision for those seeking assistance and support.

# Overall, the City's interactions with the unsheltered population are viewed as more reactive than proactive. However, the City, especially its Executive Leadership, is prioritizing a more proactive approach.

In describing their interactions with the City's unsheltered population, Departments such as Police, Fire, Health, and Emergency Management are mainly providing support when service calls are placed (i.e. an

altercation in an encampment, COVID positive individuals, unpermitted burning, etc.). Under the Reynolds Administration, executive leadership has prioritized a proactive approach in service provision to those experiencing homelessness. Examples of a more proactive approach include interdepartmental visits to encampments to provide services and connect folks to support; coordinated interdepartmental meetings led by the Mayor's Office to identify shared needs and response; and greater collaboration between City departments as well as their regional counterparts within the counties and neighboring municipalities.

## City Departments are taking more nuanced and context specific approaches to engaging with the unsheltered population.

City staff observed that in the past few years, City Departments and leadership are doing a much better job at seeing the bigger picture and taking a more systemic approach to engaging the unsheltered population. There is better collaboration internally, as well as with key service provider partners such as Street Medicine. The Reynolds Administration is making a sustained effort and providing strong direction as part of a more proactive approach to addressing the needs of the unsheltered population.

#### Sheltering options are not always immediately available.

When a City department is interacting with an unsheltered individual seeking immediate sheltering, there is not always a clear option or supportive service to provide that sheltering, especially in the cases of families and single women. Once individuals register on the "by-name list" to access shelter or other supportive services, they often still encounter waitlists. The lack of local attainable housing means that the waitlists at most regional shelters move slowly.

There is no permanent, non-congregate emergency sheltering option in the City or region. The City does have a cold-weather, 70-bed emergency shelter currently operated by a volunteer, faith-based nonprofit, Bethlehem Emergency Sheltering. BES attracts clients from all over the Lehigh Valley from mid-November until mid-April. It is unknown how long the shelter can operate at its current location due to a potential sale of the site. If the shelter closes it will leave a major void in the Lehigh Valley's emergency sheltering network.

## There are ongoing challenges to shelter unhoused individuals who do not fit within the traditional sheltering system (i.e. separation by biological sex; congregant living; etc.).

The majority of sheltering options in the City and region still subscribe to a fairly 'traditional' sheltering model and layout, including separation of populations by biological sex, congregant/shared sleeping spaces, and rules prohibiting pets, according to service providers and City officials. This congregant sleeping arrangement presents challenges for families, those who identify at LGBTQ+, couples and those suffering from post-traumatic stress disorder. These populations may opt to remain unsheltered, sleep in their car or bunk up with friends/family to avoid splitting up their family unit and feel safe.

## Any built solution needs to be geographically accessible to public transportation and key supportive services.

Access to public transportation and walkability are critical for unsheltered individuals to come and go from shelters and services as desired and provide accessibility to job opportunities.

Additionally, onsite services or proximity to surrounding, existing services is important to facilitate wrap-around support for different unsheltered populations.

In addition to these interviews, outreach was conducted for regional stakeholders during a regional roundtable meeting. Also, surveys were conducted directly with 107 unhoused individuals from the region. See <u>Appendix 2</u> (Summary of Responses from Service Users).

#### 2. At Risk of Homelessness as defined in 24 CFR 91.5

For those with sheltering services, the majority of providers follow the 'housing first' model; however, there is the recognition that this model is challenging given the current housing affordability crisis in the Lehigh Valley.

All current Lehigh Valley sheltering service providers follow the 'Housing First' model, a policy that prioritizes providing unconditional, permanent housing as quickly as possible to homeless people, and access to supportive services afterwards. Quickly ending an individual's homelessness gives them a stable foundation to pursue their personal goals. Housing First does not require people experiencing homelessness to address all potential challenges, including behavioral health issues, or to graduate through a series of programs before they can access housing. Housing First does not mandate participation in services either before obtaining housing or in order to retain housing.

The Housing First model relies on a pipeline of affordable permanent housing to move those experiencing homelessness from shelters into a permanent and long-term housing solution. While this model has historically functioned well in the Lehigh Valley, in recent years rising rents and a lack of affordable housing currently prevent a quick transition from sheltering to permanent housing.

The average length of shelter stays has increased amid the pandemic and the region's growing affordable housing crisis, leading many service providers to waive time limits on shelter stays as they struggle to move clients into more permanent housing. This necessary step further compounds shelters' waitlists.

All interviewed service providers, including those who do not operate sheltering services, emphasized the Lehigh Valley's complete lack of affordable housing options has prevented the 'housing first' model from being truly successful and impactful at this time.

## Lack of affordable housing and the affordability crisis was referenced as a significant issue facing the unsheltered population.

All of those interviewed emphasized the Lehigh Valley's affordable housing shortage, which has been exacerbated by skyrocketing rents in recent years. This creates immense obstacles in the Housing First pipeline, which seeks to quickly move those experiencing homelessness to permanent housing. The shortage of affordable units also compounds waiting periods for both shelters and the limited available affordable units.

Faced with limited affordable housing options, tenants put up with unsafe and substandard housing conditions. When a property is flagged by code enforcement and/or condemned, most landlords do not rehouse their tenants. This all contributes to the rise in housing instability locally.

The Housing Choice Voucher Program Section 8, which has historically helped people secure long-term affordable housing, is not keeping pace with local rising rents. Landlords hesitate to accept the voucher and deal with extra regulations when they can obtain much higher rents in the private rental market for less hassle. The Bethlehem Housing Authority reports only 72% of its 513 available vouchers are currently in use due to this gap.

The Lehigh Valley's 2022 fair market rent for a two-bedroom unit is \$1,196. The median rent for a two-bedroom unit was \$1,870-\$1,924 in October 2022 with just 34 units available in the City of Bethlehem, according to the City's housing needs assessment. The City's vacancy rate sits at about 2%, a sign of a housing crisis.

## Lack of affordable housing, mental health services, and addiction treatment are key issues within the unsheltered community.

Regional affordability and rising housing costs present challenges for the local unsheltered population and those at-risk of becoming homeless. Those already in shelters do not have attainable units to move into, trapping them in a cycle of housing instability. Mental health treatment and addiction treatment are key needs for the homeless population.

These issues have become more prevalent particularly in deficiencies in the continuum of care, requiring better understanding from service providers in order to properly assist individuals and assure the safety of the community.

## The City's current engagement with the homeless population focuses on operational solutions versus policy-based approaches.

The COVID-19 pandemic highlighted the operational role played by City departments, such as police, fire, health bureau, and emergency management. They distributed vaccines and personal protective equipment (PPE), as well as provided hotel vouchers and proper isolation to quell community transmissions of the virus. City staff wish to a take a more proactive role when addressing homelessness and its unique causes and factors. This includes implementing a policy-based approach to homelessness to start addressing systemic causes, lead community discussions, responses and problem-solving.

3. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

#### Spaces should integrate trauma-informed design.

Many unsheltered individuals are living with the effects of trauma, according to service providers. Congregant and open space living/sleeping areas can be triggering and may deter someone from seeking shelter if their only option is congregant.

Private sleeping areas would be a strong start to more trauma-informed sheltering. Ideally, the housing first model assists with mitigating the potential triggers for trauma by placing an individual directly in housing. The Valley's lack of an affordable housing pipeline and long-term shelter options mean it is important to

prioritize trauma-informed design in existing and future shelters.

#### Development of warehousing industry has brought trafficking to the Lehigh Valley.

In recent years, the Lehigh Valley has seen a boom in warehousing and distribution center development. This has brought huge expansions in truck traffic to the region along its major highways and interstates, including I-78. Unfortunately, this can make the Lehigh Valley prone to human trafficking. According to Valley Against Sex Trafficking, a local non-profit resource hub for trafficking victims, there have been thirteen trafficking arrests in the Lehigh Valley in the last four years alone.

4. Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

While it is acknowledged that there is an overall need for more shelter beds, the need is particularly acute for families, transitional youth (ages 18—24), single women, and the LGBTQ+ population.

There are currently no emergency sheltering options available for families (other than hotel vouchers) in the Lehigh Valley. This lack of emergency sheltering for families represents a significant and immediate local need. Without this option, families often do not seek needed shelter to avoid splitting up their family unit.

Service providers also highlighted the lack of sheltering solutions for single women, referencing that there are sheltering options for single men (e.g., Allentown Rescue Mission, Victory House, etc.), but no similar programs for single women.

Certain populations may be deterred from seeking shelter based on the prevalence of congregant living in many shelters in the Lehigh Valley. Service providers referenced that transitional youth (ages 18-24) and the LGBTQ+ community may prefer to seek alternatives to shelters (e.g. sleeping in car, sleeping outside) due to a perceived lack of safety and discomfort with current sheltering options.

## Service providers recognized the importance of their relationships with the counties (Lehigh and Northampton) to their funding and connections to resources.

The majority of service providers have strong connections with the counties due to their established sources of funding and reimbursement as well as new funding/grant opportunities, such as COVID-19-related funding streams.

Service providers report positive relationships with the counties and characterize the counties as helpful in the administration of programs and services. Providers often are better aligned with the counties than with the cities (Allentown, Bethlehem and Easton) due to the counties' roles in funding and service connectivity, according to interviews.

Families are experiencing higher rates of housing instability and homelessness. Entities such as the Bethlehem Area School District are important partners in working with service providers to identify families at risk of homelessness and connect them to services.

The Bethlehem Area School District (BASD) participates in the United Way Community Schools Program, which seeks to improve student outcomes by transforming high-poverty public schools into resource hubs offering a range of supports and opportunities to children, families and the surrounding neighborhood. Each program is structured to best meet the needs of a school's student population, but all of those interviewed said that families face enormous housing affordability challenges. Given current high rental prices in the Lehigh Valley, families sometimes find it more affordable to live in hotels, according to school officials. The rental market favors landlords, who can ask for multiple months of rent upfront and enter into rental agreements that may be unfavorable or unfair to the tenant (e.g., not providing a standard year lease with renewal options).

Housing instability in the school district is evident in schools' housing mobility rates, the percentage of students who transfer in and out of a school each year. Donegan Elementary School has a mobility rate of 41%, Broughal Middle School a rate of 33%, and Fountain Hill Elementary is close to 50%. Interviewees emphasized that parents want to keep their children in the school district and will look for a variety of options to stay at their schools – including hotels, doubling up with other families and/or family members, or accepting substandard rental properties.

Within the last two years, BASD has partnered with New Bethany Ministries and the United Way to bring on a Housing Navigator who works in the schools to help families navigate housing programs, rental assistance, and tenants' rights. This program has been immensely helpful in establishing a clear pathway to housing services and supporting families at risk of homelessness or who are currently experiencing homelessness.

## Accessibility issues within the existing sheltering options make it difficult to support individuals with mobility challenges and aging populations.

The Lehigh Valley's current sheltering facilities are largely not accessible, making it challenging to provide care to all who need assistance, according to service providers. Client advocates, such as the Lehigh Valley Center for Independent Living, noted that shelters cannot accommodate mobility devices resulting in some seeking shelter being turned away or temporarily housed.

Many of the Lehigh Valley's shelters are in retrofitted buildings or, in the case of emergency shelters, in spaces that are not traditionally used as shelters (such as churches, community centers, etc.). Most do not meet current ADA accessibility standards, and pose long-term challenges for service providers. At New Bethany Ministries, their single residency occupancy (SRO) units can only be accessed via stairs. As tenants age and potentially face mobility challenges, there is not an easy way to enhance unit accessibility.

Existing shelters cannot accommodate service animals and lack facilities for clients who may require an attendant for assistance, according to interviews.

Any future sheltering options should prioritize accessibility and address these service provision challenges, service providers and client advocates emphasized.

## For those City departments and staff who work with the unsheltered population on a regular basis, there is recognition that there are distinct populations within the unsheltered community.

From the departmental perspective, there are clear delineations among the unsheltered population that are

residing in and receiving services within the City of Bethlehem. Many of the 'chronically homeless' reside in encampments, although some utilize the Bethlehem Emergency Shelter when weather conditions deteriorate. Another portion of the unsheltered population is experiencing homelessness on a more temporary basis related to situational factors, such as housing instability, job loss, domestic violence, addiction and other issues.

#### More service coordination and regional support is needed.

More collaboration between the City and service providers is needed to create a better understanding of service options and availability. In interactions with unsheltered individuals, City departments often lack access to necessary background information and files as well as a clear and coordinated system of who to contact in different types of situations. There is a shared sentiment that the City is operating in isolation from other municipal and regional partners. More support and coordination are desired between City staff and Lehigh and Northampton counties (particularly because the City of Bethlehem's boundaries are located across the two counties).

#### **Public Participation**

PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for "reasonable notice and an opportunity to comment" for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive,
- The range of activities the PJ may undertake.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- Allocation plan public comment period: start date 10/27/2022; end date 11/11/2022
- Allocation plan public comment period: start date 2/16/2023; end date 3/3/2023
- Public hearings: 11/1/2022 and 2/16/2023

In order to broaden public participation, strengthen consultation, and comply with HUD guidance, the City held two public hearings and two comment periods. The public hearings were held with City Council on November 1, 2022, and during the evening of February 16, 2023, outside Council. The allocation plan 15-Day public comment period was open from October 27, 2022, to November 11, 2022. A second comment period ran from February 16, 2023, to March 3, 2023.

#### Describe any efforts to broaden public participation:

In addition to interview consultations, outreach was conducted for regional stakeholders during a regional

roundtable meeting. This meeting was led by Mayor Reynolds and was attended by organizations from across the Lehigh Valley. This includes many organizations that participated in one-on-one consultations, but also included other representatives, such as representatives from all three major city offices in the region (Bethlehem, Allentown, Easton). A meeting summary is included in <u>Appendix 3</u> (Roundtable Meeting Summary). Moreover, the City held two public hearings and comment periods.

Also, surveys were conducted directly with 107 unhoused individuals from the region paired with the City's development of a Strategic Plan to Address Homelessness.

Surveys were conducted orally in one-one-one interviews in Bethlehem and Allentown, with the recognition that homelessness respects no municipal boundaries. With the help of the City's service provider partners, surveying took place at five locations in Bethlehem and Allentown. Survey locations included: Ripple Community Inc., New Bethany Ministries, Daybreak Center at Lehigh Conference of Churches, Free Laundry Night with St. Luke's Parish Nursing, and Bethlehem Emergency Sheltering Weekend Lunch. Survey questions focused on accessing shelter services in the Lehigh Valley and experiences staying in the local shelters. Questions also focused on the last time an individual felt securely housed as well as what may be preventing them from obtaining housing.

Participants were compensated for their time with gift cards in line with best practices for engagement of those with lived experiences. The questionnaire is included in the appendix, along with a summary of results. See <u>Appendix 2</u> (Survey of Service Users).

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summarize the comments and recommendations received through the public participation process:

See <u>Appendix 4</u> (Public Comments Summary) for summaries of any public comment received at any HOME-ARP hearings and/or in connection with the allocation plan public comment period.

Summarize any comments or recommendations not accepted and state the reasons why:

All comments were accepted. See **Appendix 4**.

#### **Needs Assessment and Gaps Analysis**

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this allocation plan.

#### **Homeless Needs Inventory and Gap Analysis Table**

Homeless													
	Current Inventory			Homeless Population			Gap Analysis						
	Fan	nily	Adults	s Only	Vets	Family	•			Fan	nily	Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds	HH (at least 1 child)	HH (w/o child)	Vets	Victims of DV	# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	711	204	504	-	11								
Transitional Housing	362	130	299	-	62								
Permanent Supportive Housing	412	138	744	-	381								
Other Permanent Housing						58	73	4	0				
Sheltered Homeless						131	505	36	204				
Unsheltered Homeless						-	-	-	-				
Current Gap										1,485	472	1,547	-

**Suggested Data Sources:** 1. 2021 Point in Time Count (PIT); 2. 2021 Continuum of Care Housing Inventory Count (HIC) and Gap Analysis; 3. Consultation

#### **Housing Needs Inventory and Gap Analysis Table - Non-Homeless**

Non-Homeless						
	<b>Current Inventory</b>	Level of Need	Gap Analysis			
	# of Units	# of Households	# of Households			
Total Rental Units	82,035					
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	11,280					
Rental Units Affordable to HH at 50% AMI (Other Populations)	17,600					
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		12,730				
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		6,255				
Current Gaps			7,115			

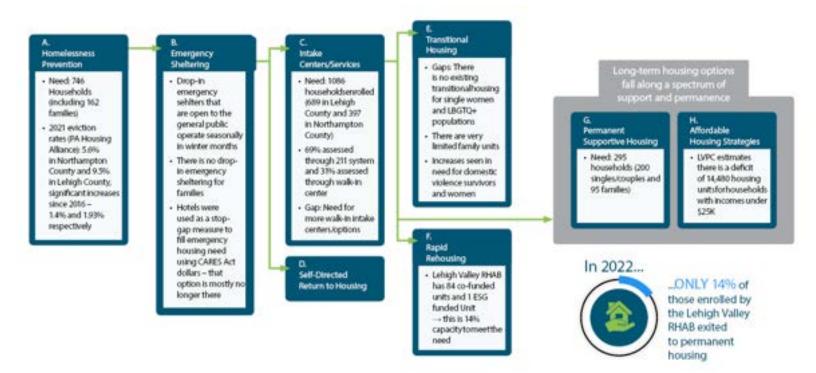
**Suggested Data Sources:** 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

For the Housing Needs Inventory and Gap Analysis Table, data was collected from the Comprehensive Housing Affordability Strategy (CHAS) using its most recent dataset, 2015-2019. Data from both Northampton County and Lehigh County was combined in to align with other regional data presented in this plan. Some data included in the table had to be downloaded from the CHAS Data Dictionary for the years 2015-2019.

Regional data is most relevant as homelessness and housing instability do not stop at municipal borders.

For Rental Units Affordable to Households at 30% AMI and 50% AMI, CHAS Data was found in Table 18C (estimates 3, 9, 28, 34, 53, 59, 78, and 84) for occupied units. These numbers also include affordable for-rent units, which was found in Table 14B (estimates 4 and 8). For Renter Households with at least one severe housing problem at 30% AMI and 50% AMI, CHAS Data was found in Table 2 (estimates 77 and 84). Then, the number of households in each income bracket was compared to the available or occupied affordable units in order to pinpoint any existing gaps.

**Estimated Needs in the Lehigh Valley**. This flowchart highlights the current level of need for different types of built sheltering solutions within the Lehigh Valley. This data was pulled from the Lehigh Valley Regional Homelessness Advisory Board's annual Statement of Need.



#### **Key Takeaways**

Research for this section included the most up to date information available from federal data sources, including the American Community Survey, Comprehensive Housing Affordability Strategy, Point-in-Time Counts, Housing Inventory Counts, and other local sources, such as data provided by the LVRHAB and other consultations. Research and consultation for this plan also coincided with the City's Strategic Plan to Address Homelessness, which helped bolster research and outreach capabilities. The City recently completed a housing needs assessment as part of its ongoing Comprehensive Housing Strategy, offering current data and local input on the state of the local real estate market.

Overall, this process resulted in the acknowledgment of a need for more emergency shelter beds, and specifically, non-congregate shelter units to accommodate a variety of populations. While there are significant gaps in affordable housing supply, there are ongoing initiatives and funding strategies within the City addressing this topic. These include the housing affordability study and a \$5 million allocation of City ARPA funds. Therefore, this allocation plan is seen as an opportunity to fill gaps in emergency sheltering, given the high focus on housing from other entities.

Below are some **key takeaways** from the needs and gap analysis, and consultations:

- There is an overall need for more emergency shelter beds and demand for year-round facilities. The Lehigh Valley has seen a 36% increase in the number of people experiencing homelessness since 2020.
- The demand is particularly acute for families, transitional youth (aged 18 to 24), single women, and the LGBTQ+ population.
- The Lehigh Valley has a significant and immediate need for emergency family sheltering. No shelters now accept entire families, which forces families to either split up or remain unhoused. Currently, hotel vouchers are the only option for families, but that money is dwindling in Lehigh County. Since the start of the pandemic, New Bethany Ministries has distributed almost \$11 million in emergency rental assistance, serving nearly 2,600 households. Currently, New Bethany is struggling to transition the 50 families it is housing in hotels into permanent affordable housing.
- The prevalence of congregant living in Lehigh Valley shelters discourages certain populations from seeking shelter. Service providers referenced that transitional youth (ages 18-24) and the LGBTQ+ community may prefer to seek alternatives to shelters (i.e., sleeping in car, sleeping outside) due to a perceived lack of safety and discomfort with current sheltering options.
- There are no current solutions aimed at supporting the area's chronically homeless population, defined by HUD as being homeless for one or more consecutive years. Service providers acknowledged that there are not long-term solutions and/or specific programs to assist this population. It was observed that many of the chronically homeless population lives in encampments, though they may access emergency sheltering in the winter months.
- Providing similar services is not viewed as a 'duplication of services,' rather it is seen as a way to make the service provision landscape more resilient. Providers emphasized that overlaps among efforts in Bethlehem and the greater Lehigh Valley enhance the resiliency of the system to respond to the growing need. Generally service providers work together and provide cross-organization referrals if needed.

#### Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

#### 1. Homeless as defined in 24 CFR 91.5

There are 921 homeless persons in the Lehigh Valley as of the 2022 Point-in-Time Count. According to the count, 841 are sheltered, and 80 are unsheltered. This includes 557 adults, 290 children under 18 years old, and 74 young adults between 18-24 years old. In total, 437 homeless persons were in households without children, 478 were in households with at least one adult and one child, six children were unaccompanied, 36 youth were unaccompanied, and 44 were in parenting youth households. There is no county data on race or ethnicity.

This large number of homeless individuals in the area backs up key takeaways from consultations. The rising demand has left Bethlehem Emergency Sheltering's 70-bed, cold weather facility operating at capacity most evenings. Their seasonal capacity is not enough to meet the demand in the City and region.

Without a year-round permanent shelter, organizations, such as New Bethany Ministries and North Penn Legal Services, report they struggle to find places to send individuals to when they are in crisis. This lack of available shelter beds highlights a critical need for the City and local services providers

#### 2. At Risk of Homelessness as defined in 24 CFR 91.5

Since the start of the pandemic, rental prices in Bethlehem have risen 57% and the median home sales price jumped by 52%, according to the City's housing needs assessment. And 9,090 residents are cost-burdened, meaning they spend more than 30% of their income on housing costs. The sharp spike in housing-related costs means more individuals than ever find themselves one emergency away from losing their permanent housing. Individuals are choosing to rent hotel rooms or double up with friends and family to save money.

Households at risk of homelessness are those with incomes at or below 30% area median income that lack sufficient resources or support networks to prevent homelessness, and have moved more than two times due to economic reasons in the past 60 days, or are doubled up with another household due to economic hardship, or will be evicted within 21 days, or live in a hotel or motel without financial assistance from a nonprofit or government entity, or live in an efficiency apartment and are overcrowded, or are exiting a publicly funded institution or system of care.

As shown in the Housing Needs Non-Homeless Table (p. 31), there is a current gap of affordable units in the Lehigh Valley. This hits the Lehigh Valley's at-risk population - comprised of 19,740 renters - especially hard. There are only 11,280 units affordable to this population, leaving a gap of 8,460 units for the at-risk population, data shows.

This data is supported by information gleaned in consultations where all named affordable housing as one of the community's top problems. The post-pandemic rise in local housing costs makes it increasingly difficult to find any affordable housing. The City's vacancy rate currently sits at 2%, essentially a crisis of supply, and its naturally affordable units have evaporated in this hot rental market, according to the City's housing needs assessment. This means if a lower-income resident loses an affordable unit it is incredibly unlikely they can find a replacement. And it is quite difficult to find landlords willing to accept Housing Choice Vouchers.

The Lehigh Valley's at-risk population -46% White, 43% Hispanic, 15% Asian, 9% Black and 0.2% American Indian -- is disproportionately minority when compared to the at-large population

Consultations identified a stress on rental assistance services due to the rising rental prices across the region. New Bethany Ministries has seen increased activity and need for staff to help those with applications for rental assistance. The rise of housing instability has led the school district to partner with New Bethany to bring housing navigators into the district's high-need schools.

#### 3. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

There are 66 total homeless persons in the Lehigh Valley that are victims of domestic violence. This is an increase from 45 in the year 2020, figures that support consultation feedback that this population rose during the coronavirus pandemic. There is no existing demographic data for this population. However, when looking at data for sheltered homeless, there are 204 domestic violence victims that are currently in shelter.

The Lehigh Valley Regional Homeless Advisory Board noted significant increases between 2020 and 2022 for individuals and households experiencing homelessness, including a 46% increase for households

experiencing domestic violence, according to the 2022 PIT Count.

Local consultation with service organizations supports the available data. Turning Point of the Lehigh Valley and the Third Street Alliance both help to support and house these populations. Their current capacities have been maxed out during the pandemic, yet there are still individuals or families that remain without shelter or service.

## 4. Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

For other homeless sub-populations, 86 persons were severely mentally ill, 26 suffered from chronic substance abuse, two suffered from HIV/AIDS, 185 suffered from a disability, 64 were veterans, and 66 were victims of domestic violence. There is no existing demographic data for these populations.

The number of individuals and households experiencing homelessness in the Lehigh Valley has increased since 2020, according to data from the 2022 Point-in-Time (PIT) Count, Lehigh Valley Regional Homeless Advisory Board (LVRHAB), and 2022 Gap Analysis of the Eastern PA Continuum of Care. The 2022 PIT Count in the Lehigh Valley identified 547 households made up of 921 people experiencing homelessness, which is a 26% increase in the number of households over the 2020 count and a 36% increase in the number of people (note there was no unsheltered count in 2021 due to COVID-19). The LVRHAB noted significant increases between 2020 and 2022 for families with children (a 51% increase), veterans (a 93% increase), individuals experiencing chronic homelessness (a 46% increase), and households experiencing domestic violence (a 46% increase), according to the 2022 PIT Count.

Consultation with Battle Borne, a Veterans' services organization, helped identify needs for this population. Largely, this includes a high need for mental health services, addiction services, disability services, and case management to help veterans access unique help that is available to them through organizations and agencies such as the U.S. Department of Veterans Affairs (VA).

#### Describe the unmet housing and service needs of qualifying populations, including but not limited to:

#### • Sheltered and unsheltered homeless populations;

Overall, 841 homeless individuals were sheltered, while 80 were unsheltered. Of the sheltered population, 679 were in emergency shelters, and 162 were in transitional housing. Emergency shelter populations are significantly higher for 2022 than in years past. The emergency shelter population was 403 in 2020, and 312 in 2021. The pandemic did drive up these numbers, as the point-in-time count notes.

Emergency shelters are stretched to capacity, and the lack of transitional housing space prevents people from leaving shelters and freeing up beds. The transitional housing population has dropped since 2020, largely due to a lack of units. Only 14% of people enrolled by the Lehigh Valley Regional Homeless Advisory Board in 2022 exited to permanent housing.

However, in a moment of crisis when an individual is becoming unhoused, the largest barrier is finding emergency shelter. Numerous service organizations mentioned a great challenge in figuring out where to send

unhoused individuals. This was true when speaking with both City service organizations, such as the police, and it was true with nonprofit organizations, such as New Bethany Ministries.

There is also a great need for increased Coordinated Entry System in-person enrollment sites as the phone wait time to register to access services can sometimes be several hours. There is a great need for case management for both the sheltered and unsheltered homeless populations as well as seamless connections to wraparound services.

#### • Those currently housed populations at risk of homelessness;

Many currently housed populations in the Lehigh Valley may be at risk of becoming homeless due to a rise in housing costs. Rents and home values in the area have increased, largely as a result of the economic effects of the pandemic. The City's median sales price has risen by 52% and the median rental price has risen by 57% over the last three years, according to the City's housing needs assessment.

Households at risk of homelessness are those with incomes at or below 30% area median income that lack sufficient resources or support networks to prevent homelessness, and have moved more than two times due to economic reasons in the past 60 days, or are doubled up with another household due to economic hardship, or will be evicted within 21 days, or live in a hotel or motel without financial assistance from a nonprofit or government entity, or live in an efficiency apartment and are overcrowded, or are exiting a publicly funded institution or system of care.

The HUD Comprehensive Housing Affordability Strategy (CHAS) 2015-2019 data provides information on households by household income level. This CHAS data indicates that there are approximately 12,730 households with incomes at or below 30% AMI that are at risk of homelessness in the Lehigh Valley.

Consulted organizations indicated stress on their rental assistance services and funding, and a lack of capacity to deal with the demand (New Bethany Ministries). In addition, there remains a lack of available public housing units within the City, and homeless individuals do not qualify for units that are owned by the Bethlehem Housing Authority. Currently, the Bethlehem Housing Authority has 130 unused housing vouchers, while the Northampton County Housing Authority has another 300 unused vouchers. The Bethlehem Housing Authority's housing and voucher waiting lists are currently closed.

#### • Other families requiring services or housing assistance or to prevent homelessness; and,

Families with children and LGBTQ+ families have trouble accessing services in the region. This is largely due to discomfort with standard emergency shelter systems, or high-barrier shelters. Families with children require extra services for childcare, and put stress on parents who are busy trying to find jobs and housing. LGBTQ+ families are stigmatized and do not feel welcome at some existing service providers in the area.

If these populations do become homeless, there is a lack of facilities to support them. While Turning Point and Third Street Alliance offer support, more services and operational capacity is needed.

The Bethlehem Area School District saw such a sharp uptick in housing needs, it partnered with New Bethany Ministries to bring housing navigators into the schools to help families remain housed and/or find housing. New Bethany remains the primary source of emergency rental assistance in the City, although its funding for

those who live in the Lehigh County portion of the City remains limited.

#### • Those at greatest risk of housing instability or in unstable housing situations:

Cost-burdened renters and extremely low-income individuals are at the greatest risk of housing instability. The Lehigh Valley has a large gap in affordable units, as shown in the Housing Needs Non-Homeless Table.

This hits the at-risk population especially hard. In this group in the Lehigh Valley, there are 19,740 households renting a home. Data shows that there are only 11,280 units affordable to this population. That is a gap of 8,460 affordable units for the at-risk population. This backs up information from consultations, which stated affordable housing as one of the main problems facing the community. It is currently difficult to find any affordable housing due to the rise in costs that resulted from the Covid-19 Pandemic. For the Lehigh Valley, this at-risk population is 46% White, 43% Hispanic, 15% Asian, 9% Black, and 0.2% American Indian. This shows that this population is disproportionately minority when compared to the at-large population.

This highlights the Lehigh Valley's growing need for rental assistance and affordable units. As demand for housing skyrockets locally, it is becoming a dire situation. The City's vacancy rate is at a crisis-level 2%; a healthy vacancy rate is 6% to 8%. The affordable housing supply is low, putting upwards pressure on the limited available properties.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

According to the Housing Inventory Count for 2022, there are a total of 1,528 year-round beds in the Lehigh Valley to assist homeless populations. Shelter units and/or supportive services in the region are provided by many organizations, including:

- Allentown Housing Authority
- Allentown Rescue Mission
- Bethlehem Emergency Sheltering, Inc.
- Catholic Charities of the Diocese of Allentown
- Cay Galgon Life House
- Community Action Committee of the Lehigh Valley (CACLV)
- Easton Area Neighborhood Centers, Inc.
- Family Promise of Lehigh Valley
- Greater Valley YMCA
- Lehigh Conference of Churches
- Lehigh County Housing Authority
- New Bethany Ministries
- Northampton County Housing Authority (NCHA)
- Project of Easton
- Resources for Human Development, Inc.
- Safe Harbor
- Salvation Army of the Lehigh Valley

- Third Street Alliance for Women & Children, Inc.
- Turning Point of the Lehigh Valley, Inc.
- Valley Housing Development Corporation
- Valley Youth House Committee, Inc.
- Victory House of Lehigh Valley

Additionally, the Bethlehem Housing Authority and NCHA both support publicly assisted units and vouchers in the City. New Bethany Ministries administers ERAP funds in the area for tenant-based rental assistance (TBRA) programs. These services are highly utilized and subject to increasing demand.

#### Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

Currently, the Lehigh Valley lacks a permanent, non-congregant overnight shelter. Instead, shelters are seasonal and largely congregant in their operation. The City of Bethlehem's Strategic Plan to Address Homelessness identified gaps in the current service provision landscape, and explored built-solution options for a permanent year-round shelter within the City.

Additionally, stakeholders identified many gaps across the entire landscape. This includes a lack of: affordable and transitional units; non-congregate shelter space, family units, and services for women.

There is currently high demand for emergency shelter beds, but a lack of support and funding to create them. This allocation plan seeks to bridge that gap as explained below. Housing affordability and related services are already top priorities for the City and region, demonstrated by Bethlehem's Comprehensive Housing Strategy and \$5 million of City ARPA funding dedicated to affordable housing. The majority of Eastern PA CoC funding is targeted at housing solutions.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of "other populations" as established in the HOME-ARP Notice:

For other populations, severe housing cost burden (paying more than 50% of household income for rent and utilities) is the primary housing characteristic associated with the risk of homelessness in the City. There are 27,675 Lehigh Valley households at or below 50% AMI who are spending more than 50% of their household income on rent and utilities, according to HUD CHAS data.

#### Identify priority needs for qualifying populations:

Consultations and data helped to illuminate additional needs for each qualifying population. This includes a lack of shelter beds for the homeless, an increasing spike in home or rent costs that put many at-risk, an uptick in those seeking asylum from domestic violence, and an increased focus on resources for other critical populations including those with mental illness, disability, or addictions.

#### 1. Homeless as defined in 24 CFR 91.5

The main priority need for this population is emergency shelter beds, and non-congregate shelter units to accommodate all populations, including LGBTQ+ and families with children. Bethlehem Emergency Sheltering reports an increase in clients since the start of the pandemic, stretching its intake limits to their capacity. They do not have enough beds to serve the homeless population and they only operate seasonally.

This example of a lack of shelter beds highlights a critical need for the City. Without a year-round shelter, there is nowhere for organizations to send individuals in crisis to when they need housing, representing a major service gap. Other organizations, such as New Bethany Ministries, indicate they struggle to place clients in crisis because most shelters operate at capacity and there are not enough shelter beds.

There is also a need for transitional housing and low-rent units for the homeless population in tandem with supportive services.

#### 2. At Risk of Homelessness as defined in 24 CFR 91.5

Lack of affordable housing is a priority need for this population. As shown in the Housing Needs Non-Homeless Table (p. 31), there is a current gap of affordable units in the Lehigh Valley. This hits the at-risk population especially hard. In this group in the Lehigh Valley, there are 19,740 households renting a home. Data shows that there are only 11,280 units affordable to this population. That is a gap of 8,460 affordable units for the at-risk population. Consultations indicated the lack of affordable housing is one of the main problems facing the community.

Consultations identified a stress on rental assistance services due to the rising rental prices across the region. New Bethany Ministries, for example, has seen increased activity and need for staff to help those with applications for rental assistance.

The City's 2022 Housing Needs Assessment has identified a critical need for moderately priced rental housing for local workers, defined as a 1-bedroom renting for less than \$1,000 and family unit less than \$1,500 a month. There is also a major need for home ownership opportunities under \$200,000 as well as rental and home repair assistance for seniors on fixed incomes.

The gap between high market-rate rents and HUD fair market rent rates means it is hard to find landlords who will take Section 8 housing vouchers. The Bethlehem Housing Authority is only using 72% of its available vouchers because of this and more landlord incentive programs are needed. The Lehigh Valley Regional Homeless Advisory Board is working to build up its landlord network and incentivizing landlords to accept the vouchers.

#### 3. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

There are 66 total homeless persons in the Lehigh Valley that are victims of domestic violence. There is a need to provide additional service and support for this group. The current shelters operate near capacity and demand is rising. This represents an increase from 45 in the year 2020, which backs up information from consultations, which stated that this population has risen as a result of the Covid-19 Pandemic.

Local consultation with service organizations confirmed some takeaways from the data. Turning Point of the Lehigh Valley and the Third Street Alliance both help to support and house these populations. Their current capacities have been maxed out during the pandemic, yet there are still individuals or families that remain without shelter or service.

## 4. <u>Other populations requiring services or housing assistance to prevent homelessness and other populations at</u> greatest risk of housing instability

Mental health, addiction and disability services were identified as high priority needs for many other populations throughout consultations. A high number of veterans and individuals experiencing homelessness also suffer from mental health or addition problems, data shows.

Amongst veterans, there is a high need for mental health, addiction and disability services, and case management to help them access the help available through sources such as Veterans Affairs, according to Battle Borne, a consulted veteran services organization.

Overall, there is a great need for behavioral health services in the Lehigh Valley, especially amongst these identified populations. The Lehigh Valley lacks adequate in-patient services for those suffering from substance abuse disorder, with the nearest substantial in-patient facilities in the Poconos and Philadelphia suburbs.

Overall needs for qualifying populations, as identified by community and stakeholder inputs, and the City's 2020-2024 Consolidated Plan, are:

- Improve existing housing stock, both rental and owner-occupied;
- Increase home ownership opportunities;
- Improve public spaces, including parks, streets and other infrastructure;
- Enhance public safety through services and environmental improvements;
- Support economic development, including infrastructure improvements to commercial areas serving nearby residential neighborhoods and through support for commercial facade improvements;
- Support neighborhood stabilization efforts and blight elimination initiatives through increased code enforcement and property clearance or rehab programs;
- Support a wide range of eligible public services and facilities, including affordable child care, beforeand after-school programming, job readiness services, mental health services, child nutrition services,
  financial literacy programs (including foreclosure prevention) and food pantries and homeless
  shelters.

Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

Level of need and gaps were determined through extensive community and stakeholder input via interviews and a regional roundtable; and individual surveys and data such as the Point-in-Time Count, the housing inventory, and CHAS.

For the Housing Needs Inventory and Gap Analysis Table, data was collected from the Comprehensive Housing Affordability Strategy (CHAS) using its most recent dataset, 2015-2019. Data from both Northampton County and Lehigh County was combined in order to be aligned with other regional data presented in this plan. Some data included in the table had to be downloaded from the CHAS Data Dictionary for the years 2015-2019.

For Rental Units Affordable to Households at 30% AMI and 50% AMI, CHAS Data was found in Table 18C (estimates 3, 9, 28, 34, 53, 59, 78, and 84) for occupied units. These numbers also include affordable for-rent units, which was found in Table 14B (estimates 4 and 8). For Renter Households with at least one severe housing problem at 30% AMI and 50% AMI, CHAS Data was found in Table 2 (estimates 77 and 84). Then, the number of households in each income bracket was compared to the available or occupied affordable units in order to pinpoint any existing gaps.

The consultations and gap analysis show the Lehigh Valley lacks shelter beds and has no year-round full-service shelter in the area. This is a huge gap in the pipeline of homelessness services, backing the pipeline up at its first step. This issue is being exacerbated by the growing number of people experiencing homelessness and at-risk of losing housing due to rising costs.

Once existing shelters are at capacity or someone is displaced, hospitals, police and service organizations have nowhere to send individuals seeking help. The existing large gap in available affordable units is being exacerbated by increasing housing costs that diminish the supply of accessible, quality local housing.

Additionally, current levels of service for families or women seeking shelter from domestic violence are not currently equipped to handle the present need. The area has a lack of shelter space for these special populations. Additionally, services for other critical populations represent high needs. There has been an increase in homelessness for veterans, and many local organizations point to the closing of State Hospitals (Allentown State Hospital, specifically) as a misstep in providing service to the disabled and mentally ill.

#### **HOME-ARP** Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

The PJ will follow any applicable federal and City guidelines for funding and selecting developers, service providers, and contractors and comply with applicable law. The PJ will administer eligible activities directly. Additionally, the City may pursue Emergency Solutions Grant (ESG) Funds in connection with this project.

If the plan is approved, the City will be pursuing partnerships with existing nonprofits and homelessness service providers to operate the shelter.

If any portion of the PJ's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

#### Not applicable.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME- ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

The following table may be used to meet this requirement.

#### **Use of HOME-ARP Funding**

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$#		
Acquisition and Development of Non- Congregate Shelters	\$ 1,334,737		
Tenant Based Rental Assistance (TBRA)	\$#		
Development of Affordable Rental Housing	\$#		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 70,250	5%	15%
Total HOME ARP Allocation	\$ 1,404,987		

#### Additional narrative, if applicable:

\$70,250 is allocated for administration and planning.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The pandemic-driven rise in housing insecurity and homelessness, paired with the uncertainty of the City's cold-weather emergency shelter's future, led the City of Bethlehem to identify non-congregate housing as the proposed use of its HOME-ARP funding.

Bethlehem Emergency Sheltering is a winter emergency shelter operated by a volunteer, faith-based nonprofit in the City of Bethlehem. The 70-bed congregant shelter attracts clients from all over the Lehigh Valley from mid-November until mid-April. It is unknown how long the shelter can operate at its current location due to a potential sale of its current location. If the shelter closes it will leave a major void in the Lehigh Valley's emergency sheltering network.

The Lehigh Valley has no non-congregate, permanent year-round shelter and does not have enough family units to meet the rising demand for shelter and services. The tenuous nature of the existing sheltering system came into sharp relief in the early days of the pandemic when the pandemic forced Bethlehem Emergency Sheltering to shut down over concerns of spreading the virus. The City stepped in opening one of its own facilities and partnered with New Bethany Ministries and local hotels to temporarily house the homeless. This all led the City to launch its Strategic Plan to Address Homelessness in 2022.

During the City's consultations, those with lived experience shared that the congregate nature of the current

sheltering system can lead them to not seek shelter, especially single women, LGBTQ+ populations and families. Non-congregate sheltering is trauma-informed, more culturally appropriate and prevents the spread of illness among clients. It gives those experiencing homelessness a greater sense of dignity and privacy, which can make them more likely to seek services, according to interviews.

The Lehigh Valley's dire affordable housing crisis is causing a corresponding rise in those experiencing homelessness. In Bethlehem, 9,090 households are cost-burdened - defined by HUD as spending more than 30% of their income on housing costs. This represents 31% of households citywide.

However, the issue is more pronounced amongst renters. Overall, 6,365 of cost-burdened households are renters. Given the City has a total of 14,330 rental households, this means that 44.4% of all renters in the city are cost-burdened. Local rents outpace those in major metros like Philadelphia.

Rising costs paired with a severe shortage of available units - Bethlehem's vacancy rate sits at 2% - means many individuals are just one unexpected bill away from the streets, according to the City's Comprehensive Housing Strategy.

Today, someone making 100% of the City's area median household income (\$56,034) can barely afford rent and can only afford to purchase a home in a few Census block groups around Lehigh University, an area facing major investor purchase pressure. Demand is so high many landlords are now requiring deposits of thousands of dollars to acquire a unit, a major barrier for low-income residents. If someone has poor credit or a prior eviction, it is virtually impossible to compete in this tight market. This means that many working individuals are experiencing homelessness for the first time in their lives.

Someone needs to be making \$64,000 to pay market-rate rents, yet the area median income for the City of Bethlehem is \$56,034. A person must make 150% of City median income to be able to purchase a home in most City neighborhoods, putting home ownership out of reach for many. This is a major concern as mortgage payments tend to be cheaper than rent and offer more long-term housing stability. The need for emergency sheltering, especially for families and vulnerable populations continues to rise, due to the lack of available units to place individuals into. The Bethlehem Area School District reports a 53% increase in homelessness over the last two years. New Bethany Ministries has spent more than \$11 million on emergency rental assistance keeping individuals in their homes or sheltered in hotels. The program remains well-funded in Northampton County for the time being, but the Lehigh County section of the city does not have access to this funding.

The City of Bethlehem is undergoing a Comprehensive Affordable Housing Strategies study currently to determine how to invest \$5 million of American Rescue Plan dollars into housing solutions. The majority of CoC funding in the Lehigh Valley is targeted towards rapid rehousing and permanent supportive housing, but there is not much money available for emergency sheltering. The City also has HOME funds available for the development of affordable housing and is building a dedicated affordable housing fund via a tax incentive payment-in-lieu of fee.

#### **HOME-ARP Production Housing Goals**

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

The PJ will support Acquisition and Development of Non-Congregate Sheltering. It will not produce or support rental housing units.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:

The PJ hopes to establish a permanent shelter with supportive services to allow individuals access to affordable housing services and organizations.

#### **Preferences**

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).

PJs are not required to describe specific projects to which the preferences will apply.

The PJ does not intend to give preference to any one Qualifying Population. Individuals and families from all qualifying populations will be eligible to apply for and be admitted to the non-congregate shelter. This plan process has highlighted a need for non-congregate sheltering for all qualifying populations, and the PJ will fill this gap with this funding. While there is a large need for housing affordability, there are initiatives currently underway to address these initiatives in the City.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The City is not identifying a preference, and individuals and families from all qualifying populations will be eligible to apply for and be admitted to the non-congregate shelter.

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

The City is not identifying a preference, and individuals and families from all qualifying populations will be eligible to apply for and be admitted to the non-congregate shelter.

#### **HOME-ARP Refinancing Guidelines**

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME- ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under with the PJ will refinance existing debt for a HOME-ARP rental project, including:

The City of Bethlehem does not intend to use HOME-ARP to refinance any existing debt.

• Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity

Not Applicable

• Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.

Not Applicable

• State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.

Not Applicable

• Specify the required compliance period, whether it is the minimum 15 years or longer.

Not Applicable

• State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

Not Applicable

• Other requirements in the PJ's guidelines, if applicable:

Not Applicable

### **APPENDICES**

#### CITY OF BETHLEHEM, PA HOME-ARP ALLOCATION PLAN

- **Appendix 1 Consultation Questions**
- **Appendix 2 Summary of Responses from Service Users**
- **Appendix 3 Roundtable Meeting Summary**
- **Appendix 4 Public Comments Summary**
- **Appendix 5 Public Notices and Announcements**
- Appendix 6 City Council Resolution 2023-39, authorizing submission of Plan p.114 of PDF

# Appendix 1 Consultation Questions

#### Appendix 1

#### **External Consultation – Interview Questions**

#### Section 1: Understanding your organization's role in the current service provision landscape

- 1. How do you, in your position or organization, currently engage with the unsheltered population in Bethlehem?
- 2. What types of services or programs does your organization provide to the unsheltered population?
  - a. Are there any conditions or requirements that clients need to meet in order to receive these services?
  - b. Can you describe any significant changes in your services in the past few years?
  - c. In providing these services, what would you say have been your organization's biggest successes? Biggest challenges?
- 3. In what ways does your organization engage with City initiatives, programs, and solutions affecting the unhoused population?
- 4. In what ways does your organization engage with regional initiatives, programs, or partnerships focused on the unsheltered population?

#### **Section 2: Context and current situation**

- 1. How would you characterize the key issues facing the unsheltered population in Bethlehem today?
  - a. Have there been any notable changes in recent years?
  - b. How about the larger region?
- 2. From your experience, what are the key supportive services requested by the unsheltered population?
- 3. From your experience, what types of spaces and amenities are most needed by the unsheltered population?
- 4. In regards to existing service providers for the unsheltered population, where are there gaps? Where is there duplication of services?
- 5. Who do you view as key external partners for the City's Strategic Plan to Address Homelessness? Ideally, how would these partners be engaged?

#### **Section 3: Improving sheltering options**

- 1. When considering a permanent year-round shelter in the City, whether it is one site or multiple sites, what are some of the important factors in regards to the location and building?
- 2. In planning for a future permanent year-round shelter in Bethlehem, what factors do you think are important to consider?
  - a. Are there particular areas in the city that are best suited or not well suited, in your view? Why? What would be the key opportunities and key challenges of these areas?
  - b. What are some important considerations in terms of the physical building being used for a year-round shelter?
- 3. How do you envision a year-round shelter in Bethlehem fitting into the landscape of other emergency sheltering programs in the Lehigh Valley?

#### Section 4: Wrap up

- 1. Is there anything I haven't asked that you think is important for us to understand or consider?
- 2. Do you have suggestions of specific groups, service providers, community members, or other stakeholders who should be engaged in this process?

#### **Internal Stakeholders – Interview Questions**

#### **Section 1: Context and current situation**

- 1. As you understand it, can you describe the historical and current perspectives on homelessness in Bethlehem?
  - a. To the extent you are able, can you describe the City and community perspectives?
- 2. How would you characterize the key issues facing the unhoused population in Bethlehem today?
- 3. From your experience, what are the key supportive services requested by the unhoused population?
- 4. From your experience, what types of spaces and amenities are most needed by the unhoused population?

#### Section 2: Understanding the current service provision landscape

- 1. How do you, in your position, currently engage with the unhoused population in Bethlehem? Historically what has engagement looked like for this position?
- 2. What types of services/initiatives/programs/policies does your Department/Office provide to the unhoused population? What has been most successful? What has been challenging? Can you describe any significant changes in these services, etc. in the past few years?
- 3. In regards to existing service providers for the unhoused population, what is working well? Where are there challenges? Where are there gaps? Is there a duplication of services in any area(s)?

#### **Section 3: Improving sheltering options**

- 1. When considering a permanent year-round shelter in the City, what are some of the important factors in regards to the location and building?
- 2. In planning for a future permanent year-round shelter in Bethlehem, what factors do you think are important to consider?
  - a. Are there particular areas in the city that are best suited or not well suited, in your view? Why? What would be the key opportunities and key challenges of these areas?
- 3. Who do you view as key external partners for the City's Strategic Plan to Address Homelessness? Ideally, how would these partners be engaged?
- 4. How do you envision Bethlehem engaging with initiatives, programs, and solutions affecting the unhoused population at the regional scale?

#### Section 4: Wrap up

- 1. Do you have suggestions of specific groups, service providers, community members, or other stakeholders who should be engaged in this process?
- 2. Is there anything I haven't asked that you think is important for us to understand or consider?

## Appendix 2

Summary of Responses from Users of Services

#### Appendix 2

#### **Survey of Service Users**

Date and Time	Location	Surveys Conducted (107 Total)
Thursday, 8/4/22	Outreach at Ripple Community Inc	18
1:30-3:30pm	(1335 Linden Street Allentown PA 18102)	
Friday, 8/5/22	Daybreak Center	33
11:45am – 3:30pm	(457 W Allen St Allentown PA 18102)	
Tuesday, 8/9/22	Free Laundry Night	24
4-6:30pm	(Family Wash Day 911 Linden Street Allentown PA 18102)	
Wednesday, 8/10/22	New Bethany Ministries	18
10:30am – 1:30pm	(333 W 4 <sup>th</sup> Street, Bethlehem PA)	
Saturday, 8/13/22	United Church of Christ	14
11:30am – 1pm	(75 Market St, Bethlehem PA)	

#### 1. How old were you the first time you experienced homelessness?

Of the 107 individuals surveyed, 18 did not respond or could not remember, and 11 indicated that they first experienced homelessness as a minor. Five respondents said that their first experience with homelessness occurred within the last calendar year. Of those who provided an age, the average was 37 years old, ranging from 8 to 73.

#### a. How old are you now?

Twenty individuals did not provide an age. For those who provided an age, the average was 48 years old, ranging from 20 to 77. Additionally, 12 respondents are currently in their 20s, while 21 are in their 60s or higher.

#### 2. This past winter, which shelter services have you used?

- o Bethlehem Emergency Shelter 20
- o Allentown Emergency Shelter (YMCA) 25
- Safe Harbor 4
- Allentown Rescue Mission 12
- o Valley Youth House **3**
- o Family Promise 0
- Other overnight shelter:
  - 1. Victory House 2
  - 2. Salvation Army 1
  - 3. New Bethany 1
  - 4. Ripple Community 1
  - 5. Lackawanna County 1
  - 6. Statesville 1
  - 7. Connecticut 2
- No Shelter: 50

#### a. Can you share a good experience that you had at a shelter?

Sixty respondents did not have a good experience to share. Forty-six indicated they had a positive experience at least once at a shelter. Common responses included meeting other people or making friends, helpful staff members, and having a warm place to go or a warm meal. Four respondents mentioned help from case workers or other services. Positive responses were distributed across many of the shelters, with nothing statistically significant for one single shelter.

#### b. Can you share a bad experience you had at a shelter?

Seventy-two respondents did not have a bad experience to share. Thirty-four shared examples of a bad experience. Of these, 11 pointed to stealing, drug use, or rough cultures within the shelter that made them feel uncomfortable or unsafe. Nine indicated negative experiences resulting from shelter rules, such as shelter requirements, curfew, shower hours, and limited accessibility. Five mentioned negative experiences with staff. Two were uncomfortable with the overall acceptance of spending a night in a shelter, which made them upset. Finally, two mentioned overcrowding.

#### 3. Have you ever been turned away from a shelter?

- a. No. 81
- b. Yes. 26
  - i. If so, what happened?
    - 1. Shelter was too full or there was no availability 8
      - 2. Too late 5
      - 3. Lack of I.D. or documents 4
      - 4. Protocol Violation (Kicked out, Shower misuse, Covid, Pet) 4
      - 5. Other
        - a. Stayed away for too long, and they thought I found a place.
        - b. My case was closed.
        - c. Breathalyzer
        - d. Asking for money/account issues
      - 6. Only 4 respondents indicated specific shelters
        - a. Allentown Rescue Mission: 3
        - b. Allentown Emergency Shelter Warming Station

#### 4. Have you ever chosen not to stay at a shelter for any of the following reasons? [check all that apply]

- a. I couldn't stay with my spouse/partner/family 6
- b. I couldn't bring my pet 1
- c. I didn't have a place to store my belongings while I was at the shelter 1
- d. I felt unsafe 4
- e. I felt unwelcome or unwanted 4
- f. I didn't get along with the staff 2
- g. It was too hard to get to or from the shelter 2
- h. I was worried that the shelter would run a background check 1
- Other
  - i. Have another place to stay (Hotel (1), Friend/Family (7), prefer to be alone/outside
     (3))
  - ii. No or No Answer: 59

5.	This winter,	where have	you slept	at night?	[check all th	at apply]

- a. In my own home/apartment 13
- b. In a rented room 9
- c. In a hotel 2
- d. In a shelter 20
- e. At a friend's home/At a family member's home 18
- f. In a tent or in the woods 17
- g. At the hospital/waiting room 3
- h. In a laundromat, parking garage, or other similar space 1
- i. Other
  - i. Car or Van 4
  - ii. Outside, Streets, Park, On My Own 13
  - iii. No Answer: 10

#### 6. Think about the last time you were securely housed in a place that you considered to be your "home". Why did you leave that home? (Check all that apply)

- a. Kicked out 6
- b. Ran away 6
- c. Abuse at home (physical, emotional, sexual) 1
- d. Drug use at home (yourself or others) 2
- e. Neglect 0
- f. Self-harm 0
- g. Gang-related conflicts 0
- h. Mental health 2
- i. Criminal involvement 3
- j. Disagreeing with expectations/rules at home 5
- k. Relationship conflicts (family, friends, significant others) 11
- 1. Basic needs not being met (shelter, food, clothing, etc) 3
- m. Other
  i. No Answer: 21
  - ii. Evicted 6
  - iii. Crowding, Condemned, Landlord Issue: 15

#### 7. What is keeping you from finding housing?

- a. I can't find a place I can afford. 45
- b. I have a physical disability and can't find an accessible apartment. 8
- c. I have a pet and can't find an apartment that accepts pets. 0
- d. I have past evictions that make it hard to find a place to live. 2
- e. I have a criminal background that makes it hard to find a place to live. 3
- f. I'm more comfortable "sleeping rough" 2
- g. Other:
  - i. N/A or No Answer: 26
  - ii. Waiting or Applied: 10
  - iii. Lacking I.D. or other documentation 6

#### 8. Where do you spend time during the day when the shelters are closed?

- a. At a day program like Daybreak, the Club House, Ripple Community Inc., or The Gathering Place **51**
- b. At a recovery center like Change on Hamilton or the Northampton County Drop In Center **0**
- c. At the library 9
- d. At the bus station 1
- e. At a friend's or family member's house 12
- f. At a coffee shop, laundromat, or other business 1
  - i. Other
    - 1. No Answer or NA: 18
    - 2. Outside or On my Own: 19
    - 3. Work: **10**

Roundtable Meeting Summary

#### **Regional Roundtable Summary**

<b>Date and Time</b>	City and Consultant Hosts	
	Hannah Clark – Michael Baker International	
	Chris Rabasco – Michael Baker International	
	Laura Collins – Director of Community Development	
July 18, 2022	O22 Sara Satullo – Deputy Director of Community Development	
1:00pm-2:30pm	Robert Vidoni – Housing and Community Development Administrator	
	Janine Santoro – Equity and Inclusion	
	Mayor J. William Reynolds	

In July 2022, Bethlehem Mayor J. William Reynolds convened a Regional Roundtable on Homelessness in the Lehigh Valley to bring together elected officials, local government, service providers, institutions, and private sector partners to share information, ideas, goals, opportunities, and challenges to begin to lay the groundwork to support systemic change and real solutions for those experiencing homelessness and housing instability.

Participants at the Regional Roundtable were asked their perspectives on some of the main drivers of homelessness in the Lehigh Valley. Their responses are synthesized in the word cloud below.

While these challenges are distinct, the systems they are part of – the housing market, education, social services – need to be connected. A key focus of the Regional Roundtable was to identify points of connection and collaboration. The July 18<sup>th</sup> Roundtable was envisioned as the beginning of a series of discussions, workshops, and ultimately the launch of programming and policies to support unsheltered community members across the Lehigh Valley.

#### Participants in the July 18th Regional Roundtable

Local	City of Bethlehem			
government	City of Allentown			
and School	City of Easton			
District	rict Northampton County			
Partners	Lehigh County			
	Bethlehem Area School District			
Community	nunity Historic Bethlehem Museum and Sites			
organizations	New Bethany Ministries			
	Bethlehem Emergency Sheltering			
	Lehigh Valley Regional Homeless Advisory Board			
Institutions	utions Lehigh University			
	Moravian University			
	St. Luke's University Health Network			
	Lehigh Valley Health Network			
State and	nd PA Representative Steve Samuelson			
Federal	ral PA Senator Lisa Boscola			
Elected	ted PA Representative Jeanne McNeill			
Officials	Congresswoman Susan Wild			

Some of the initial ideas around collective regional work include:

- Identifying physical locations for intake to the 211 System as the phone lines are incredibly overwhelmed and wait times can be upwards of two hours.
- Collaboration to pursue existing and new resources from state and federal government, including the Housing Options funding coming from the State.
- Identify a permanent shelter so we can address needs when they happen.
- Consider purchasing a hotel to rehab into a shelter.
- Engage all municipalities, not just the major cities.

Responses from Regional Roundtable Participants on drivers of homelessness in the Lehigh Valley (collected July 18, 2022)



# Appendix 4 Public Comment Summary

## Public Comments Received at the November 1, 2022 HOME-ARP Allocation Plan Public Hearing

- 1. Jeffrey R. Zettelmoyer expressed support for the initiative and expressed willingness to consult with the City on the project.
  - a. **City response:** The City takes this comment under advisement. No action related to the HOME-ARP allocation plan is contemplated.
- 2. Anna Zawierucha requested that green space be incorporated into the final plan.
  - a. **City response:** The City has not chosen a site for the project. Depending on the site selected, and other factors including financial and operational concerns, the City will consider the inclusion of green space into the project.
- 3. Lindsay Altvader Clifton expressed support for the initiative.
  - a. **City response:** No action related to the HOME-ARP allocation plan is contemplated.
- 4. J. Marc Rittle emphasized the need for comprehensive case management as part of a homeless sheltering program.
  - a. **City response:** At this stage of the shelter project, the City is not certain what services may ultimately be provided in connection with this initiative. In working with an eventual shelter operator, the City will consider ways that case management, housing, and other services may be linked with the shelter services.
- 5. Liam and Kathy Caceres indicated there is a need in the community for this project and expressed support for the initiative.
  - a. **City response:** No action related to the HOME-ARP allocation plan is contemplated.
- 6. St. Luke's University Health Network submitted a comment letter responding to the City's draft HOME-ARP plan during the City's 2021 Annual Action Plan substantial amendment process. St. Luke's expressed concerns about a "large-scale permanent emergency shelter in South Bethlehem" because it would "amass a high need population" from across the Lehigh Valley into the neighborhood. In its letter, St. Luke's urged the City to conduct a transparent planning process and collaborate regionally.
  - a. **City response**: The City has not selected nor acquired a site for this project. St. Luke's participated in two one-on-one consultations and a regional roundtable during the HOME-ARP consultation period.

- 7. Hispanic Center Lehigh Valley (HCLV) submitted a comment letter responding to the City's draft HOME-ARP plan during the City's 2021 Annual Action Plan substantial amendment process. HCLV writes it is committed to working with the City and community partners to address homelessness via a comprehensive evidence-based approach. HCLV staff is concerned by plans to develop a "large-scale homeless shelter" in South Bethlehem where HCLV is located. HCLV's interim executive director is a St. Luke's employee. HCLV is concerned a shelter could exacerbate existing socioeconomic disparities in South Bethlehem and strain organizations struggling to meet current needs. HCLV notes the community lacks access to mental health resources. HCLV is worried a shelter could endanger its staff and clients.
  - a. **City response**: The City has not selected nor acquired a site for this project. Non-congregate sheltering offers individuals safe and private sheltering and access to supports, like mental health services, during the day,

City of Bethlehem

**HOME-ARP** Allocation Plan

**Public Notices** 

### CITY OF BETHLEHEM, PA AMERICAN RESCUE PLAN (HOME-ARP) PROGRAM ALLOCATION PLAN PUBLIC COMMENT PERIOD

Posting Date: February 16, 2023

#### NOTICE OF PUBLIC REVIEW AND COMMENT PERIOD

Notice is hereby provided that the required 15-day public review and comment period for the City of Bethlehem, PA, ("City") HOME-ARP Program Allocation Plan ("Allocation Plan") will begin on Thursday, February 16, 2023, and end on Friday, March 3, 2023. The Allocation Plan will allocate the City HOME-ARP funds to the activities described below. The City will also hold a public hearing on the Allocation Plan on Thursday, February 16, 2023, at 6:00 p.m. in Town Hall Rotunda, 10 E. Church St., Bethlehem, PA 18018.

**Purpose of HOME-ARP Funds.** To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through the HOME Investment Partnership Program (HOME) to perform activities that must primarily benefit qualifying populations who are homeless, at risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or in certain other populations not included in the above populations (each a "Qualifying Population," and collectively, "Qualifying Populations").

City's HOME-ARP allocation: \$1,404,987

Eligible Uses for HOME-ARP Funds. HOME-ARP recipients can use HOME-ARP funding for: (1) Acquisition, rehabilitation, adaptive reuse, or construction of affordable rental housing, including permanent supportive housing for Qualifying Populations. (2) Tenant-based rental assistance (TBRA) to help Qualifying Populations pay rent, security deposits, and utility deposits and payments. A broad range of supportive services to prevent homelessness and foster housing stability such as emergency assistance, job training, childcare, and educational services. (3) Acquisition and development of noncongregate shelter to create private temporary units/rooms for households experiencing homelessness or fleeing abusive situations. (4) Capacity Building & Nonprofit Operating to build capacity and financial stability in local nonprofit organizations serving your community with HOME-ARP activities. (5) Administration and planning to hire, train, and support new staff to select, manage, monitor, and evaluate HOME-ARP projects and activities. Applicable United States Department of Housing and Urban Development (HUD) CPD notices control eligible uses and supersede the above language on eligible uses in the event of any inconsistency.

**City's Planned Use of HOME-ARP Funds.** The City's Allocation Plan allocates HOME-ARP funds for acquisition and development of a non-congregate shelter to serve Qualifying Populations (defined above) and Administration and Planning expenses incurred by the City and/or its agents related to the Allocation Plan and the overall project. Individuals and families from Qualifying Populations will be eligible to apply for and be admitted to the non-congregate shelter.

**Draft Allocation Plan Availability**. The Allocation Plan is available on the City's website (see below), in hard copy from the *Community Development Bureau* (1st Floor, in Department of Community and Economic Development, 10 East Church Street, Bethlehem, PA 18018), and via email request to tgross@bethlehem-pa.gov. City Hall is open from 8:00 AM through 4:30 PM, Monday through Friday, excluding public holidays. The Allocation Plan is also available at the following locations:

- Lobby area of City Hall, 10 East Church Street, Bethlehem, PA 18018 (see the door monitor at the front desk);
- Bethlehem Public Library, Main Library, 11 West Church Street, Bethlehem, PA 18018 (see the front desk, telephone number 610-867-3761);
- Bethlehem Public Library, South Side Branch, 400 Webster Street, Bethlehem, PA 18015 (see the front desk, telephone number 610-867-7852); and
- On the City's website, at the address below:

 $\underline{https://www.bethlehem-pa.gov/CityOfBethlehem/media/DCED-Media-Library/CommunityDevelopment/COB-HOME-ARP-allocation-plan-with-cover.pdf}$ 

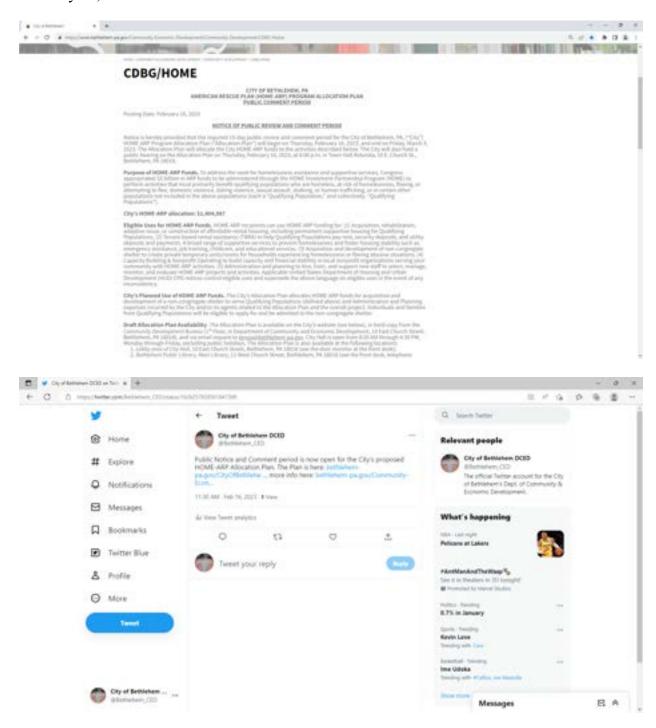
Comments on Allocation Plan and/or in connection with Public Hearing. Written comments on the Allocation Plan or the public hearing may be emailed to Robert Vidoni, Housing and Community Development Administrator, at <a href="maileo:rvidoni@bethlehem-pa.gov">rvidoni@bethlehem-pa.gov</a>, with copy to Trevor Gross, Grants Specialist, at <a href="maileo:tgross@bethlehem-pa.gov">tgross@bethlehem-pa.gov</a>, or delivered or mailed to Robert Vidoni, Community Development Bureau, 10 East Church Street, Bethlehem, PA 18018. Phone comments may be provided by calling 610-865-7085 and speaking with Trevor Gross, Monday through Friday, 8:00 AM through 4:30 PM.

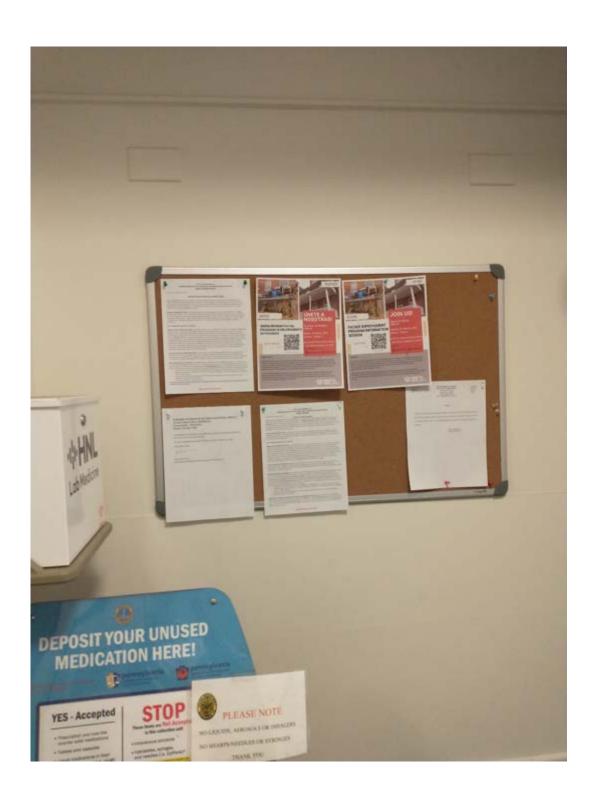
**Translation Services; Accessibility/Reasonable Accommodations.** If you are in need of translation services related to this public hearing, please contact Trevor Gross at tgross@bethlehem-pa.gov or 610-865-7085, no later than 4:00 PM on February 16, 2023. If you are in need of translation services, or other reasonable accommodations, related to reading the written Allocation Plan or providing comments to the Allocation Plan, please contact Trevor Gross at tgross@bethlehem-pa.gov or 610-865-7085 by Wednesday, March 1, 2023. City Hall and Council Chambers (Town Hall Rotunda) are wheelchair accessible. Special parking is available at the primary entrance to City Hall at 10 East Church Street, Bethlehem, PA 18018. Persons with disabilities, or others, who plan to attend the public hearing on February 16, 2023, and who might need auxiliary aids or services, or accessibility assistance, should contact Trevor Gross, information above, no later than 4:00 PM on Thursday, February 16, 2023.

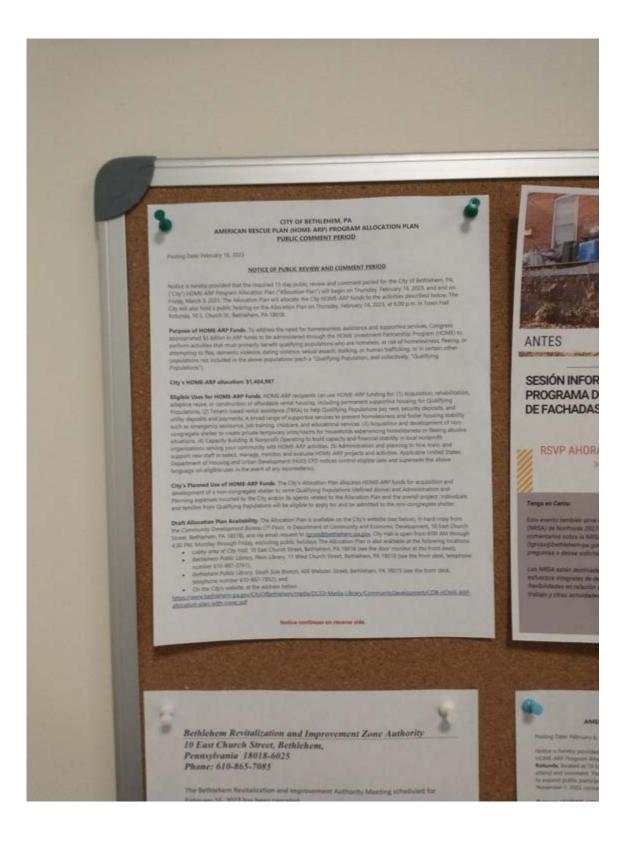
**Applicable Law.** This notice is issued in accordance with HOME and other applicable laws and regulations. The City does not discriminate based on disability. The public hearing will be held in compliance with applicable fair housing and civil rights laws and requirements.

CITY OF BETHLEHEM, DEPARTMENT OF COMMUNITY AND ECONOMIC DEVELOPMENT, COMMUNITY DEVELOPMENT BUREAU. First floor, 10 East Church Street, Bethlehem, PA 18018. Phone: (610) 865-7085

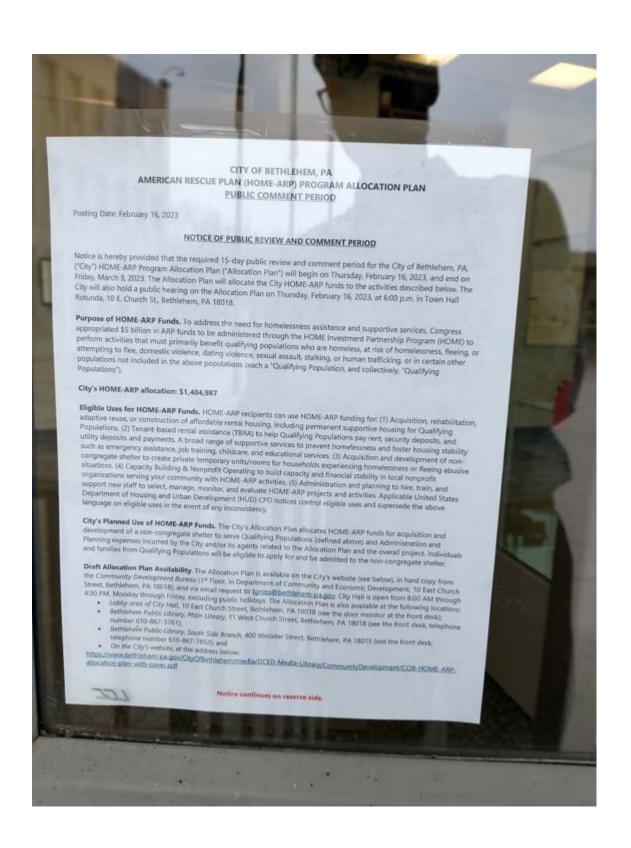
#### February 16, 2023 Review and Comment Period

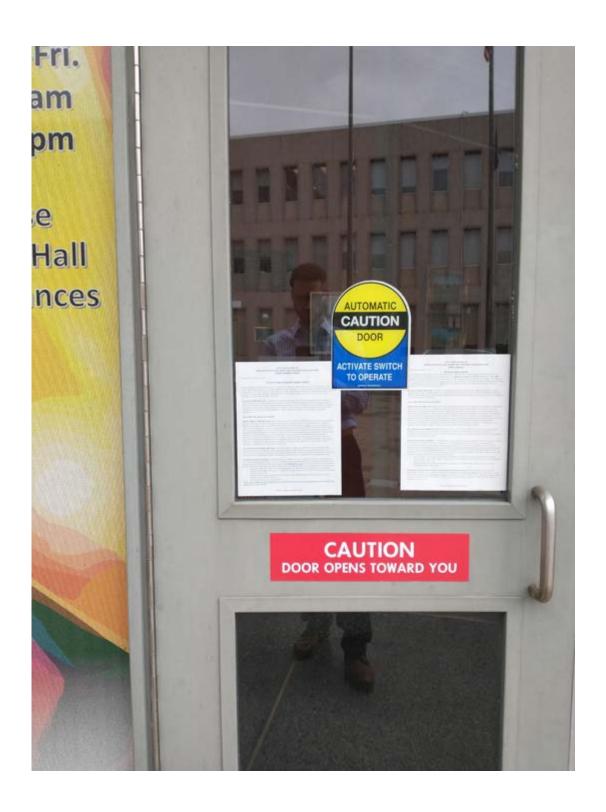


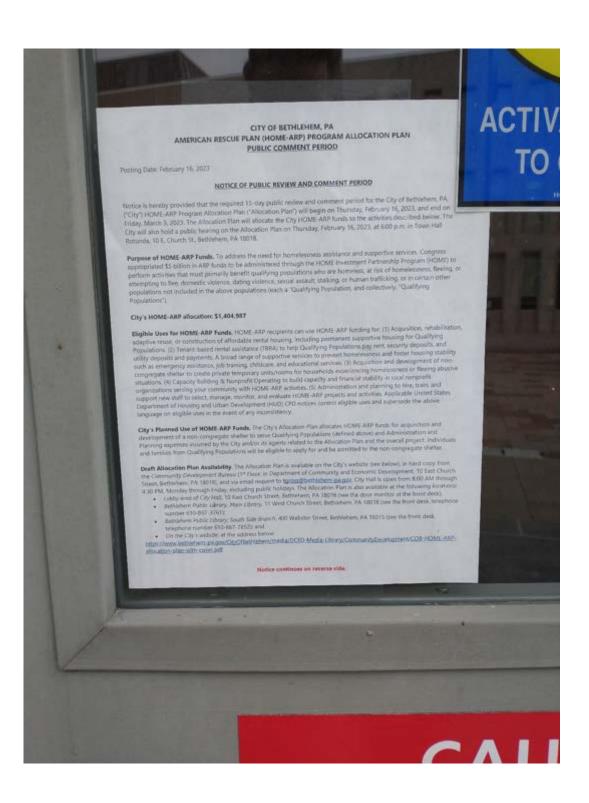


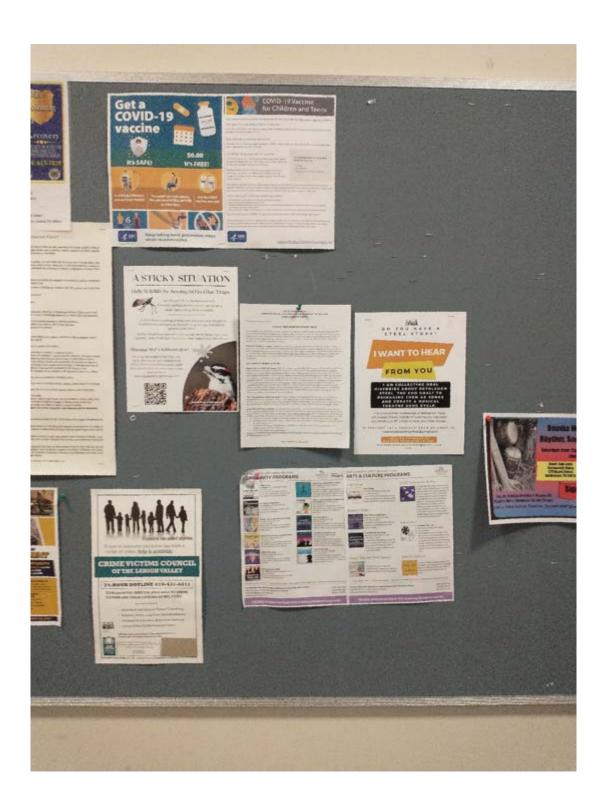


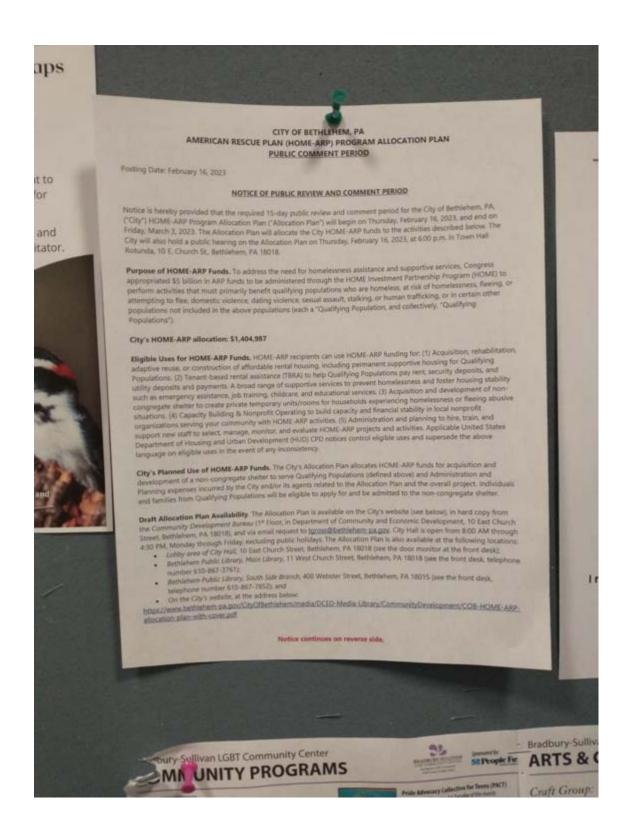






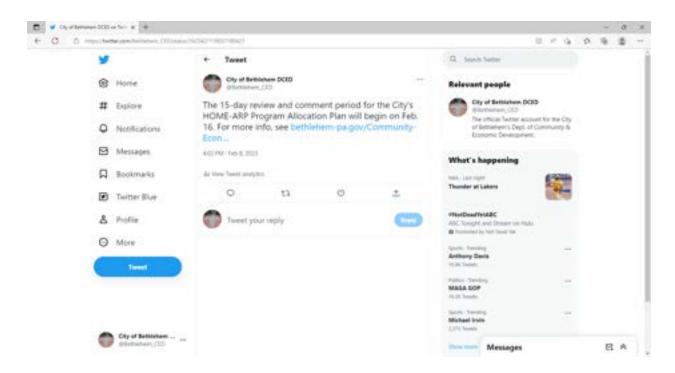


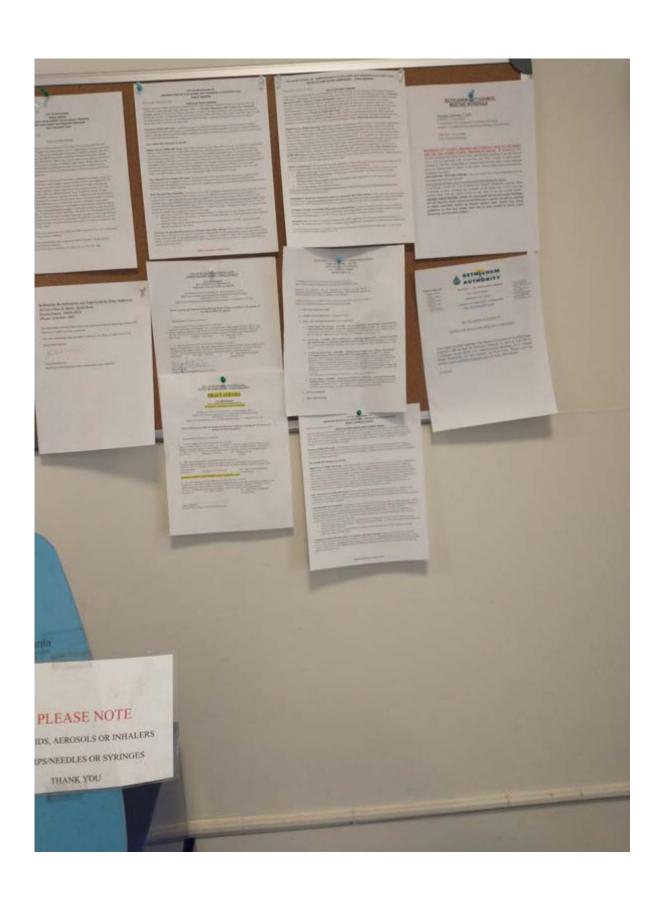


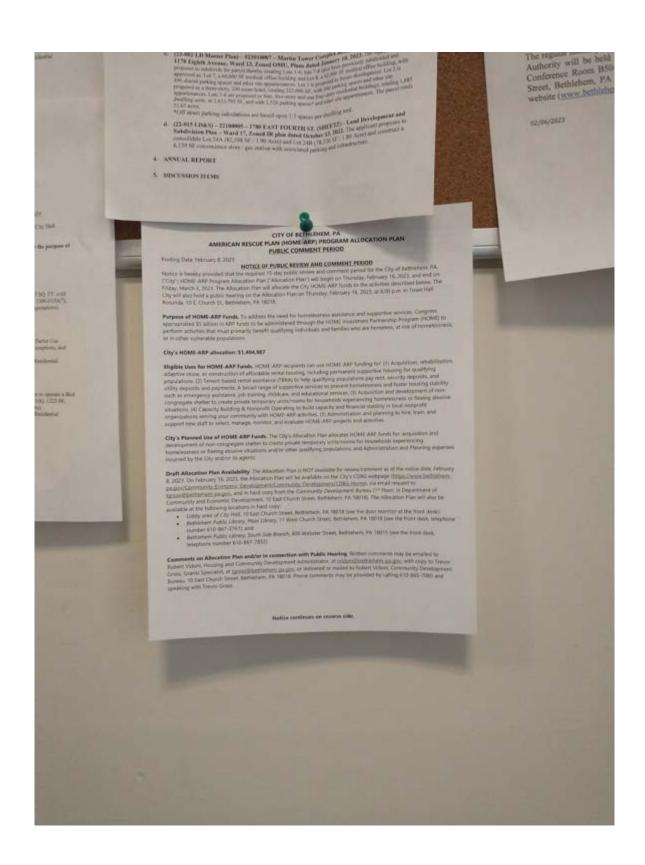


#### February 8, 2023 7-day precomment notice

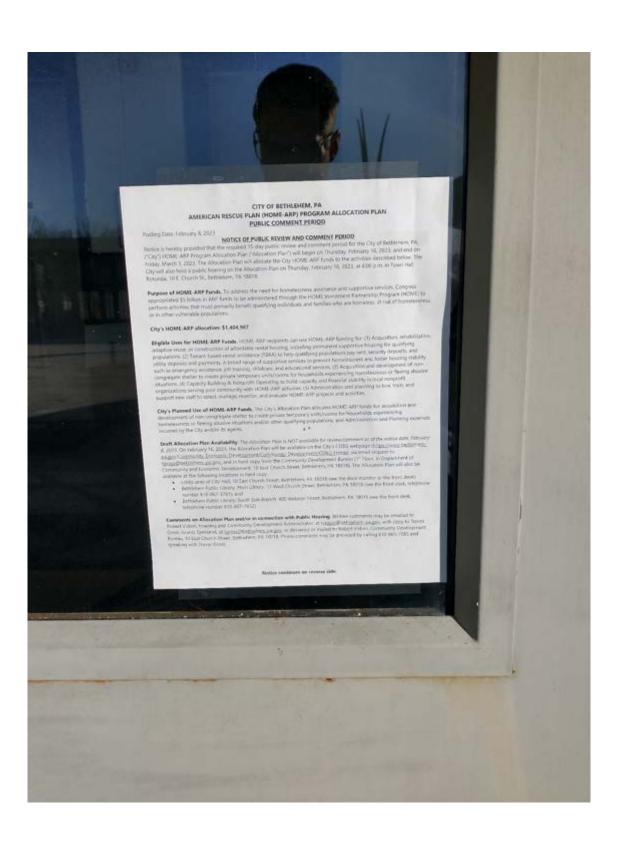


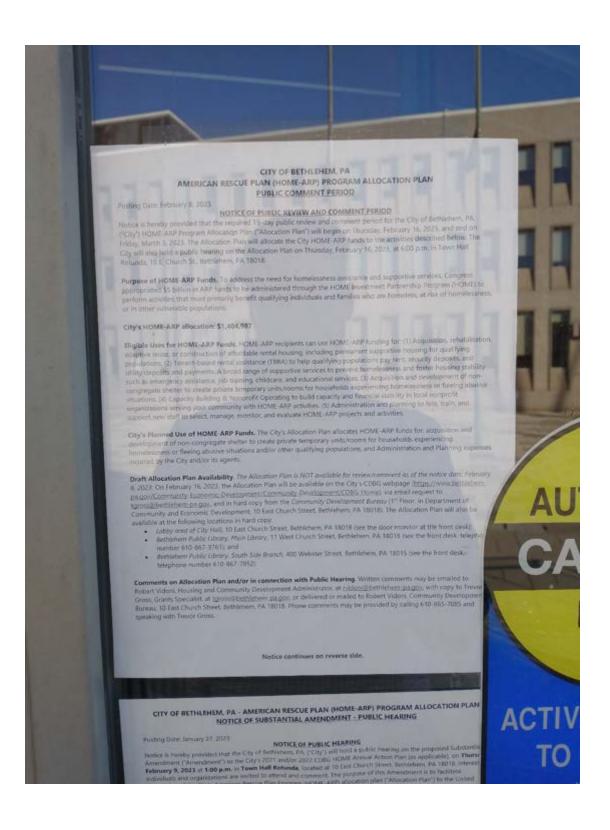


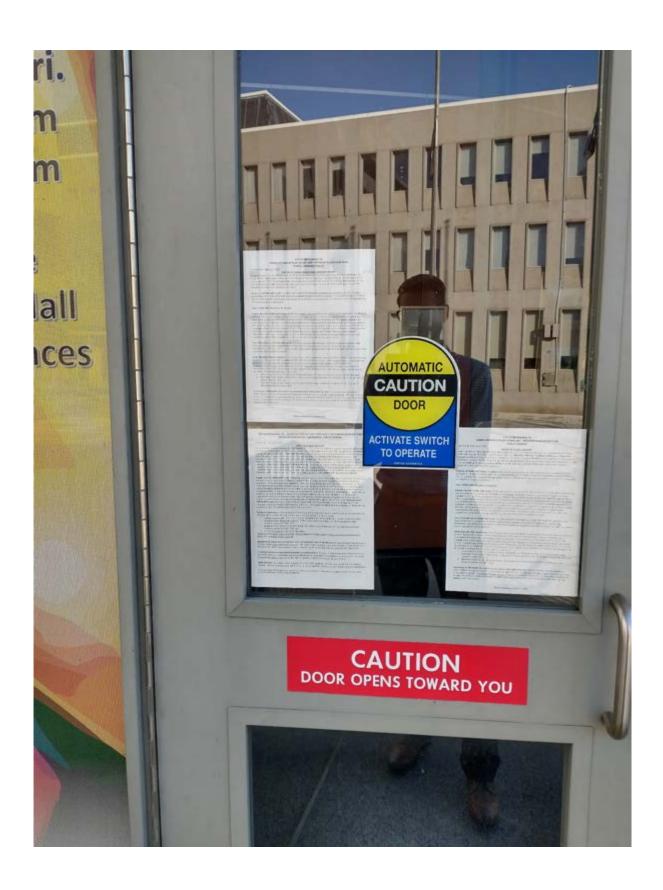


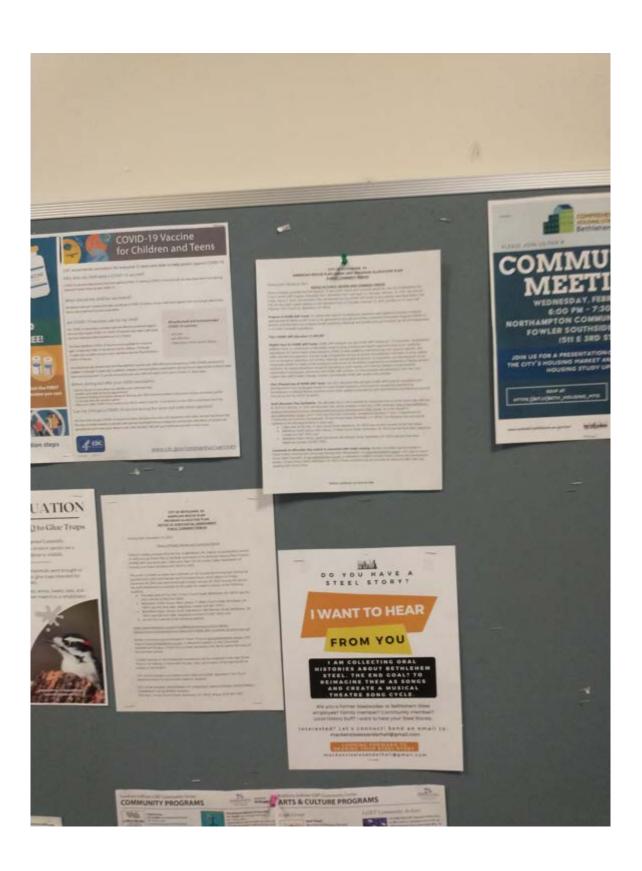


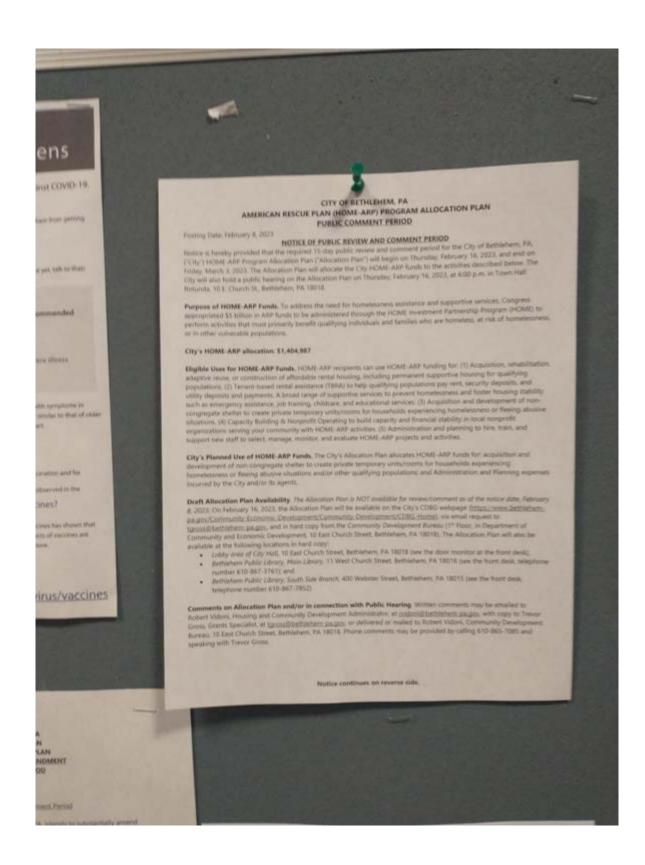




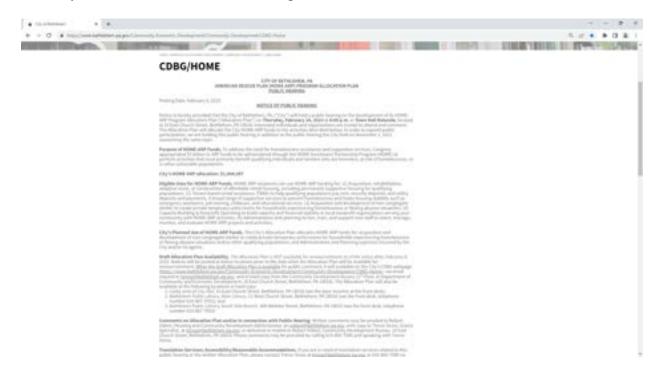


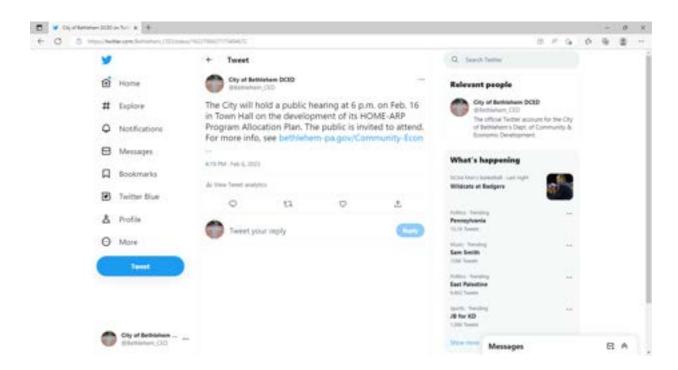


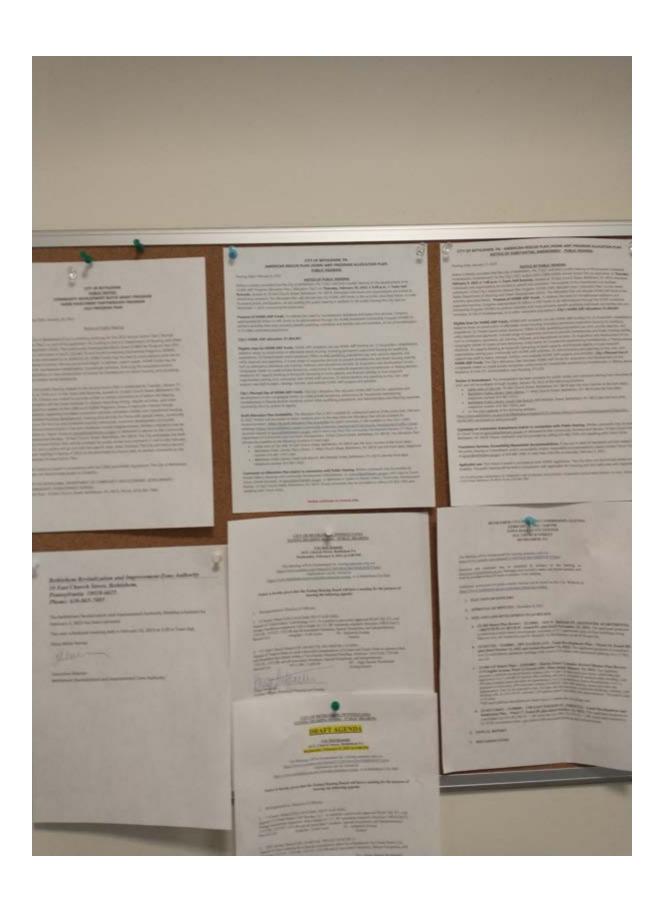


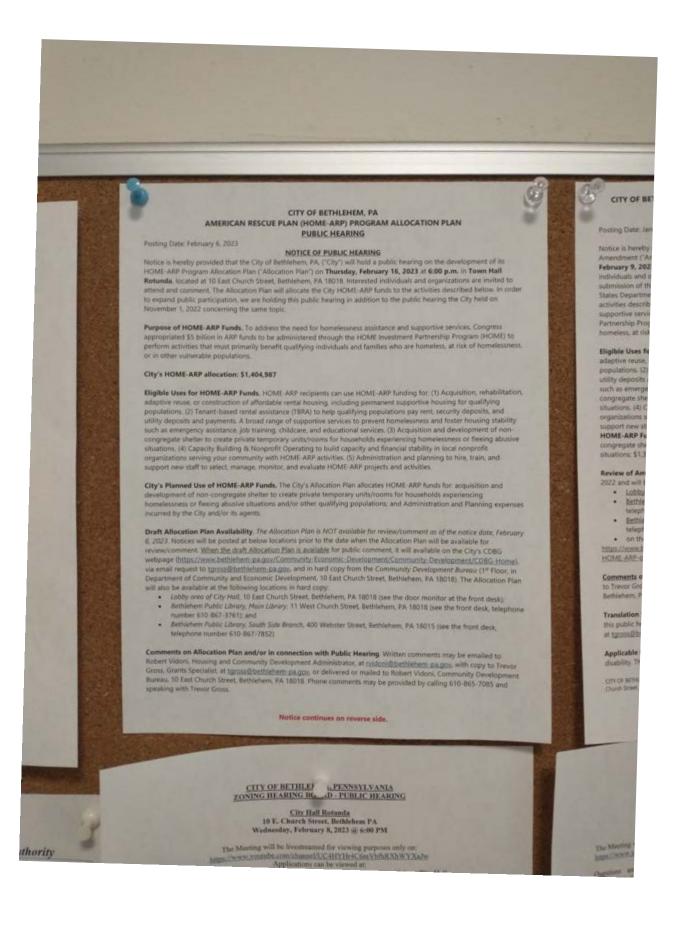


#### February 6, 2023 Notice of Public Hearing











#### CITY OF BETTER BIESS, PA AMERICAN RESCUE PLAN (HIGHE ARP) PROGRAM ALLOCATION FLAN PUBLIE HEARING

Posting Date February 6, 2013

#### HISTOR OF PUBLIC HEARING

Protein is building promitted that the City of Buttlisham. Fit, 11 or 2 will hold a public bearing on the decellopment of He HOME ARE Fragient Associate Flan ( American Flan ) on Houseley, Estimary 16, 5924 of 6-80 p.m. in Festin Half Naturals, to could at 10 Last Church Great Bullington, PA Liberts uncreased individuals and organizations are Durinel to affected and construct. The Allocation Plan will affect the Etty Lincoln. ARP hands to the extreme plantitude feation for order he expand public participation, we are highling this public hearing to addition to the public hearing the City field bit.

Purpose of HOME ARP Funds. To address the result for homelescopic existence and supporting services, Congress appropriated Mt Million to ARP hands to be administrated through the FE/ARE Investment Performance Program (AE/ARE) to perform activities that must primarily lievallit quaritying individuals and familiar orth and formulass, at risk of immediances, or in other enterable propulations.

#### City's HOME-ARP allocation: \$1,404,807

Bigible Uses for HOME ARP Funds. (1934). Air response can use (1934). ARP funding for (1) Association, rehabilisation, adaptive music or condituation of affordable rental housing including permanent supportive feneling for qualifying propulations. (2) Teresis bused rankel acciviance (198A) to take qualifying populations pay rent, security deposits, and utility deposits and payments. A knowleaving of supportion services to present terrestagation and feater insuring stability such as energiancy existance, job transing stabilities, and substituted services. (2) Arguments and development of more congregate shelter to create private temporary unitariously for townsholds experiencing homelessness or fleeing afronce situations: 50 Capacity Building & Morgrofit Operating to build capacity and Anancial stability in local number of organizations serving your community with HCMM ARY activities. (It) Advantuation and planning to him, train, and support new staff to extent manage, monitor, and evaluate HOME. Aftir projects and activities,

City's Planned Use of HOME-ARP Funds. The City's Allocation Flan allocates HOME ARP funds for acquirition and development of non-compagate shelter to create private temporary units/norms for households experiencing Technology or Resing abovins objection and/or other qualifying populations, and Administration and Planning expenses incurred by the City and/or its agents.

Deaft Allocation Plan Availability. The Allocation Plan is AOT evaluable for revision amount as of the notice data. February A. 2023. Reduces will be posted at holiou locations prior to the data when the Africation Flan will be available for review/comment When the shaft Affincation Plan is evaluable for public represent it will available on the City's CORD webpage (IMDs.//sevochell/comment/comment/comment/comment/comment/comment/comment/comment/comment/comme via erroll request to Sponsible District pages, and in hard copy from the Community Development Response to Four In Department of Community and Economic Development, 10 East Department, Bethration, FA 18018). The Africation Plan will also be available at the following tocalises in hard cappy

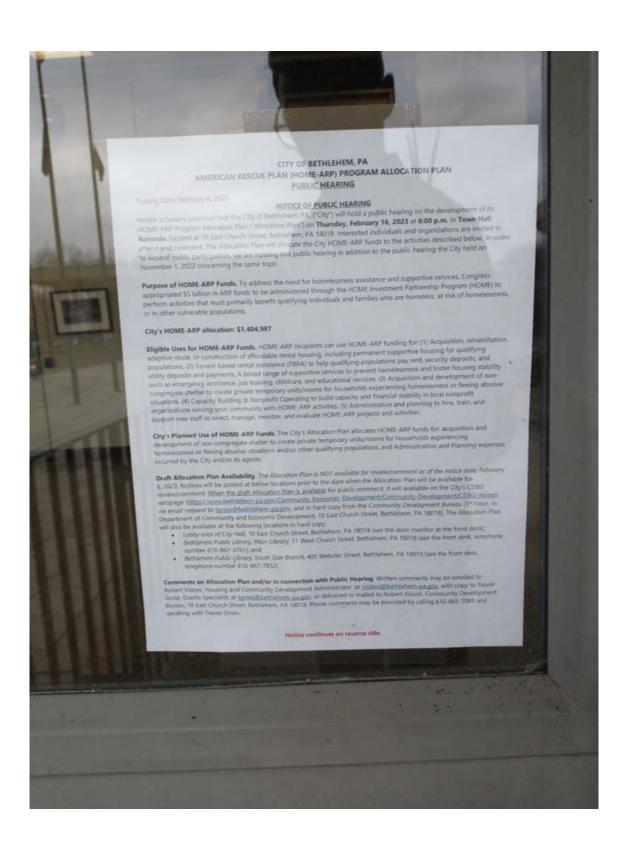
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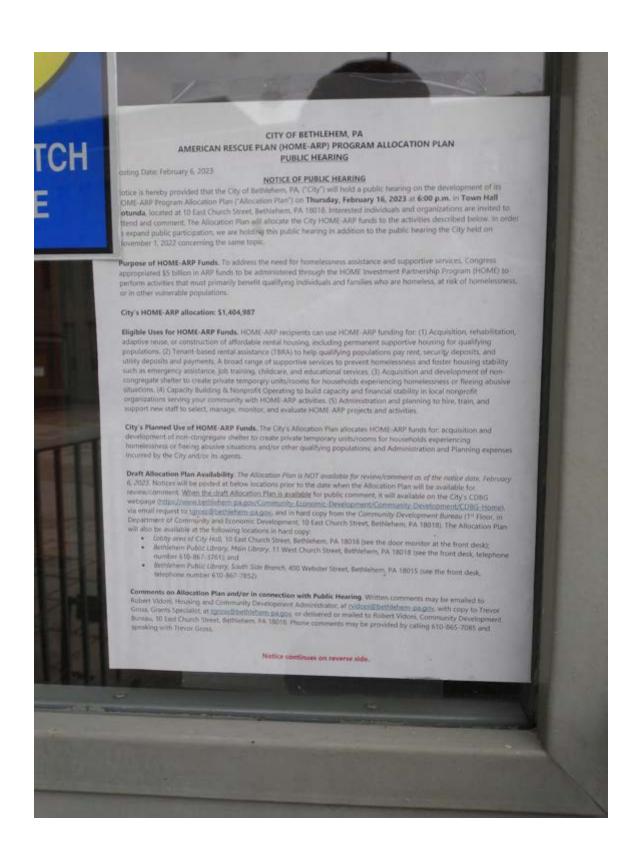
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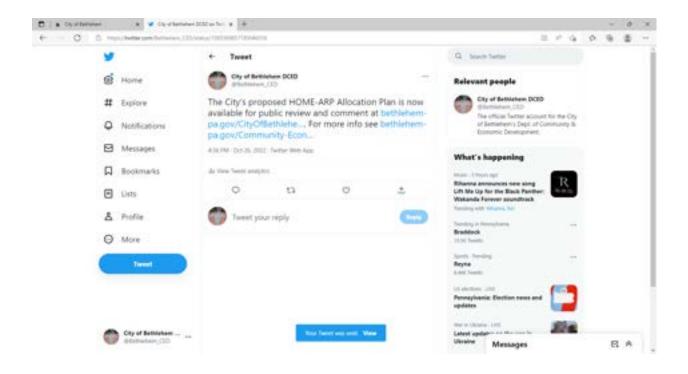




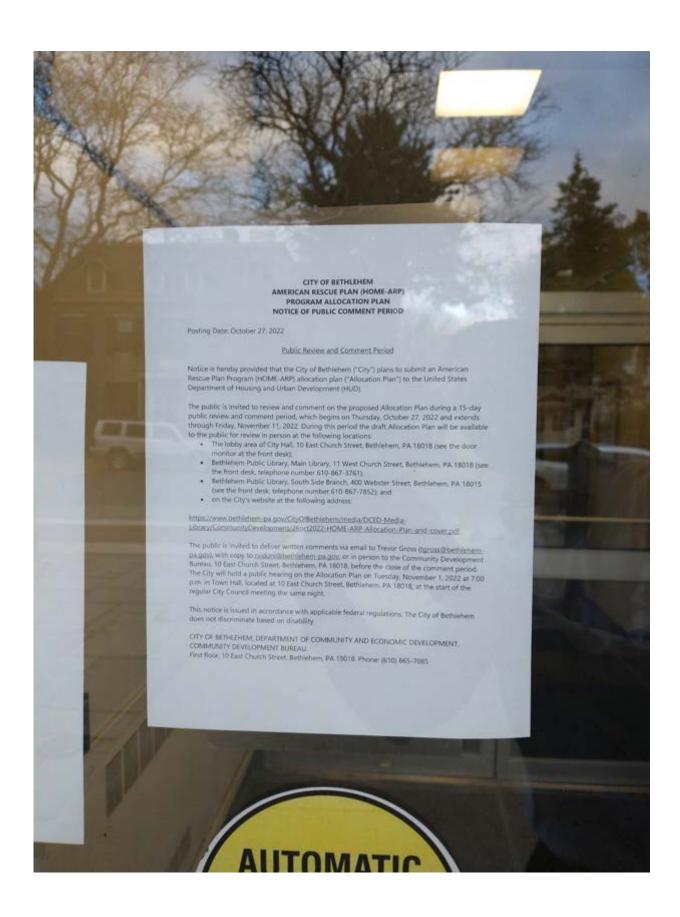


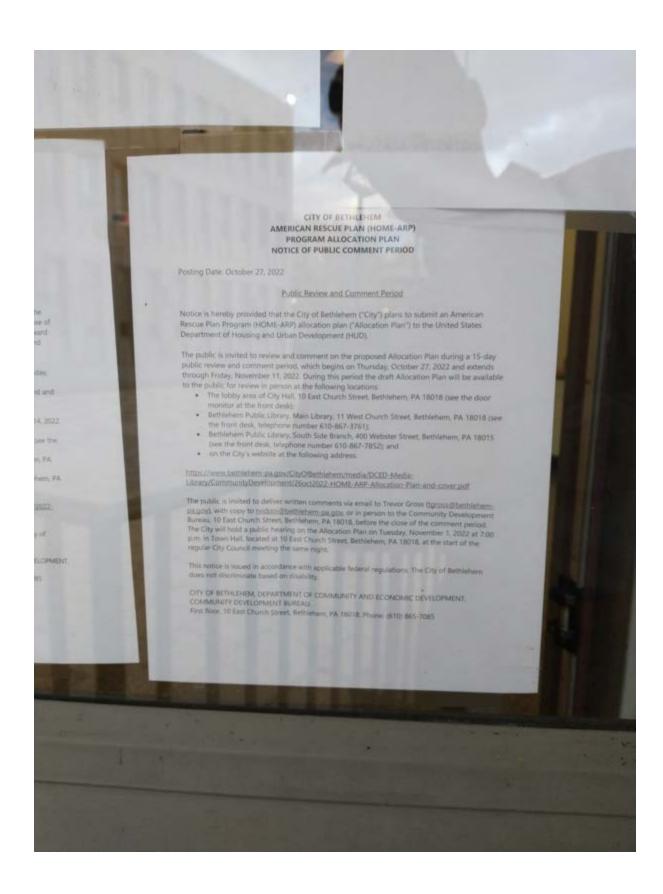


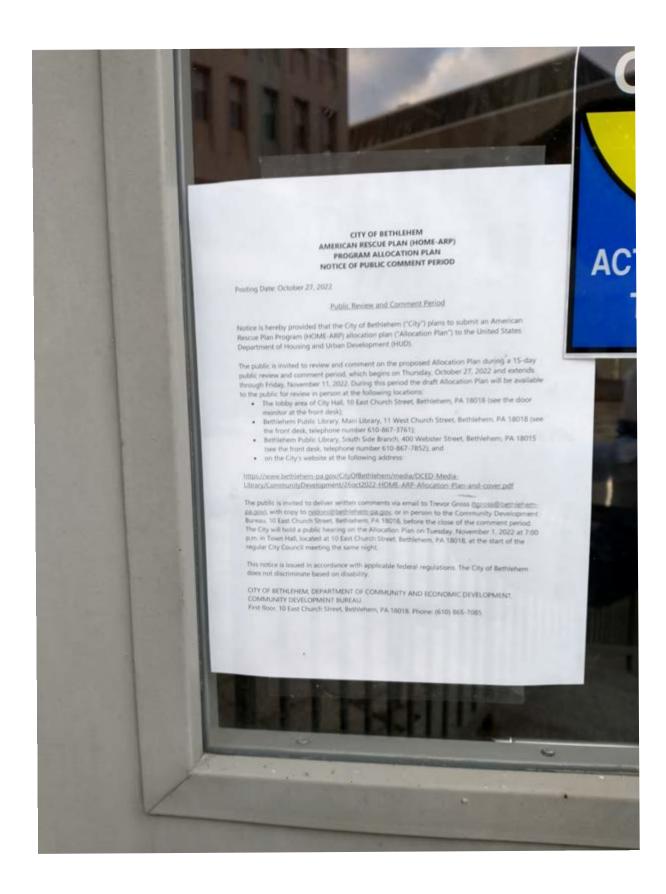
## October 27, 2022 Review and comment period

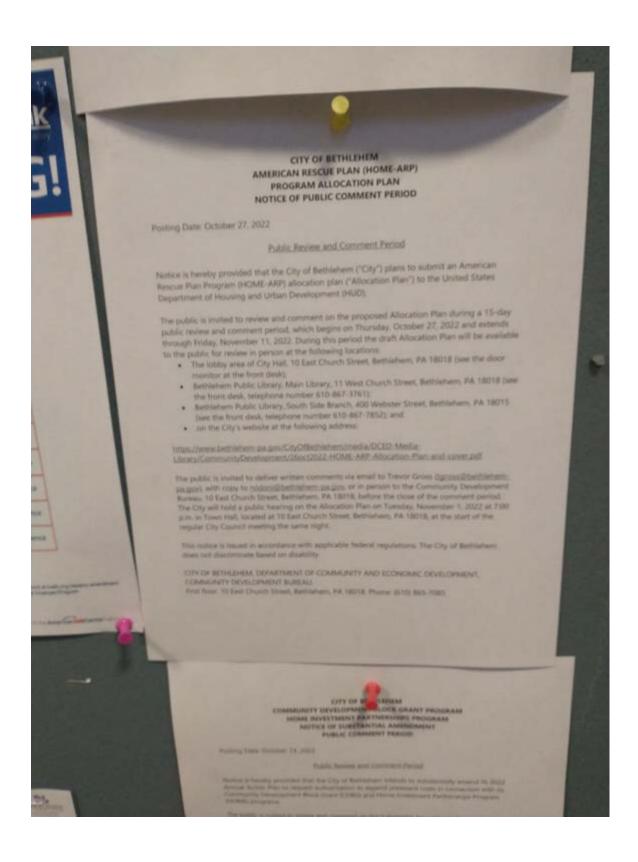


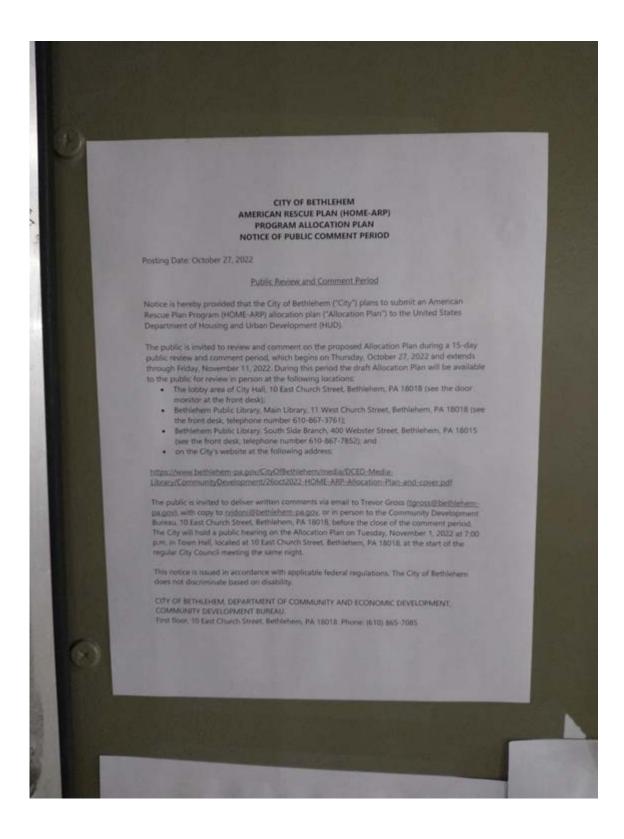




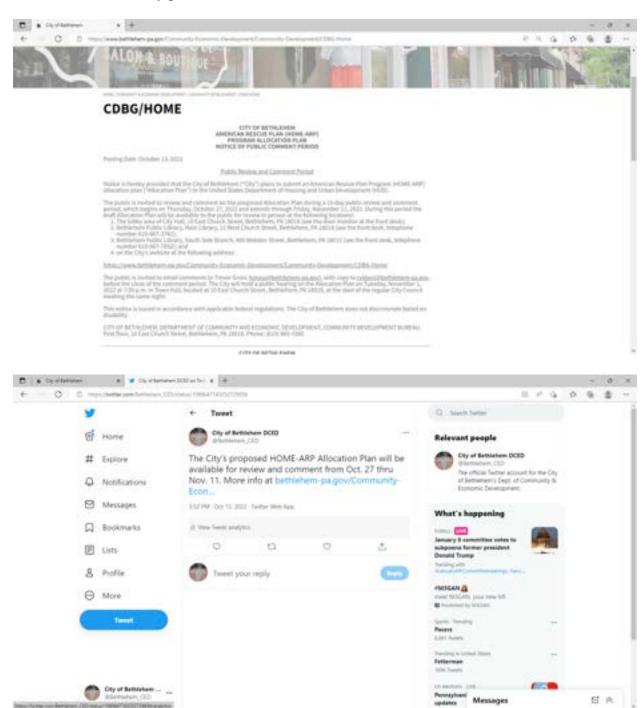


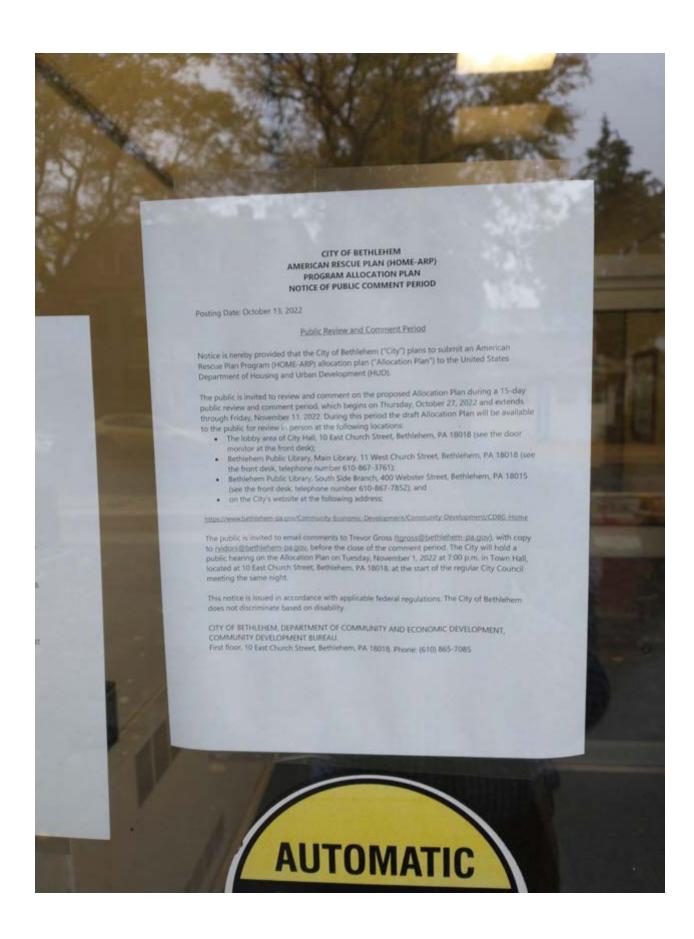


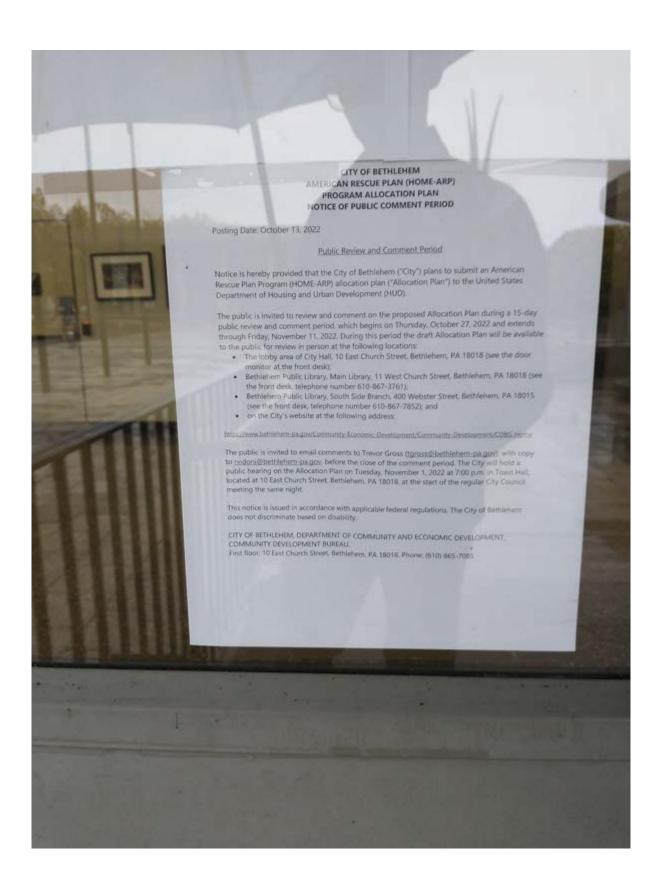


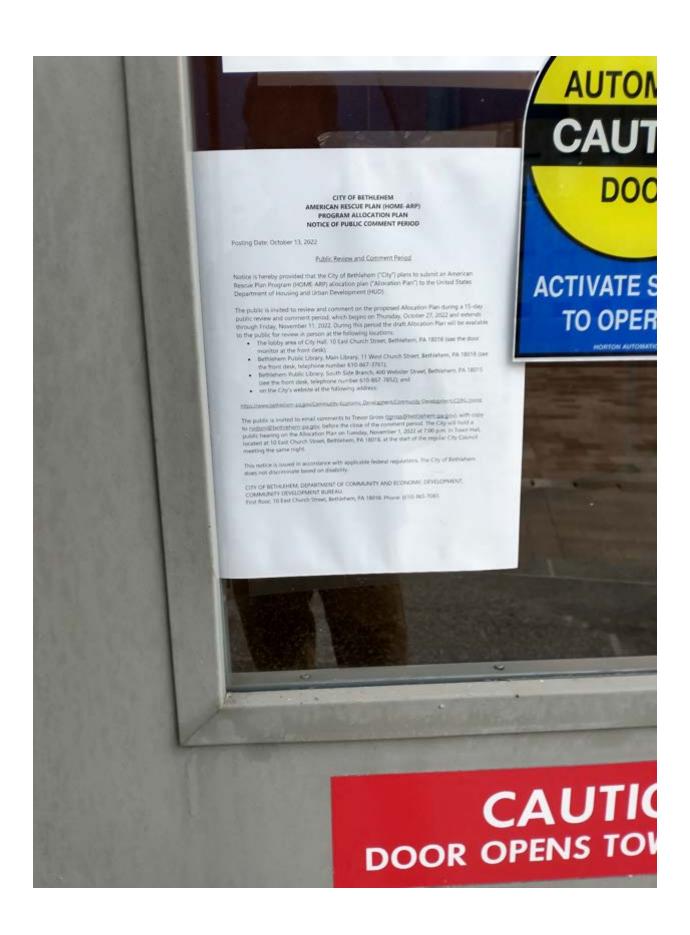


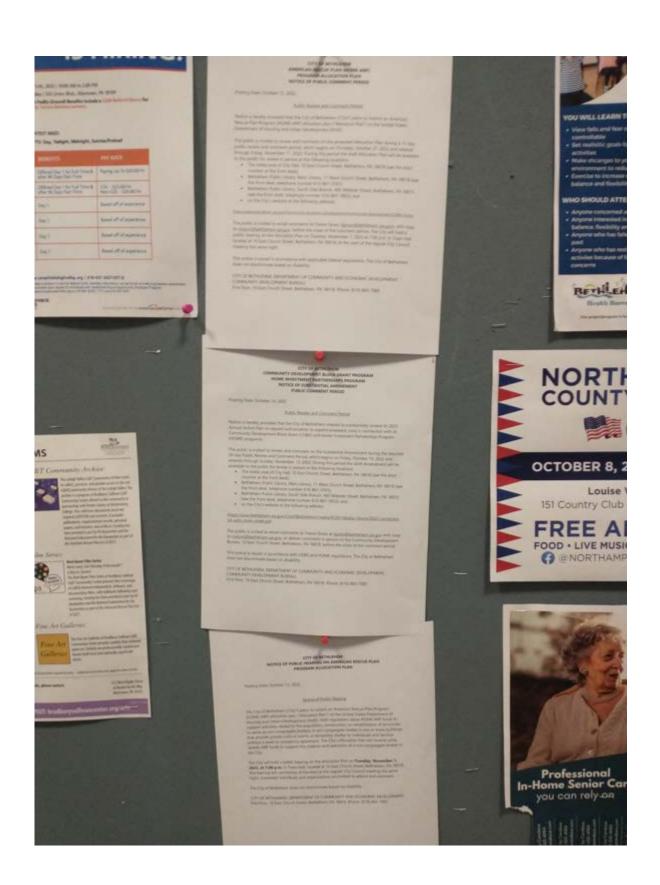
## October 13, 2022 7-day precomment notice

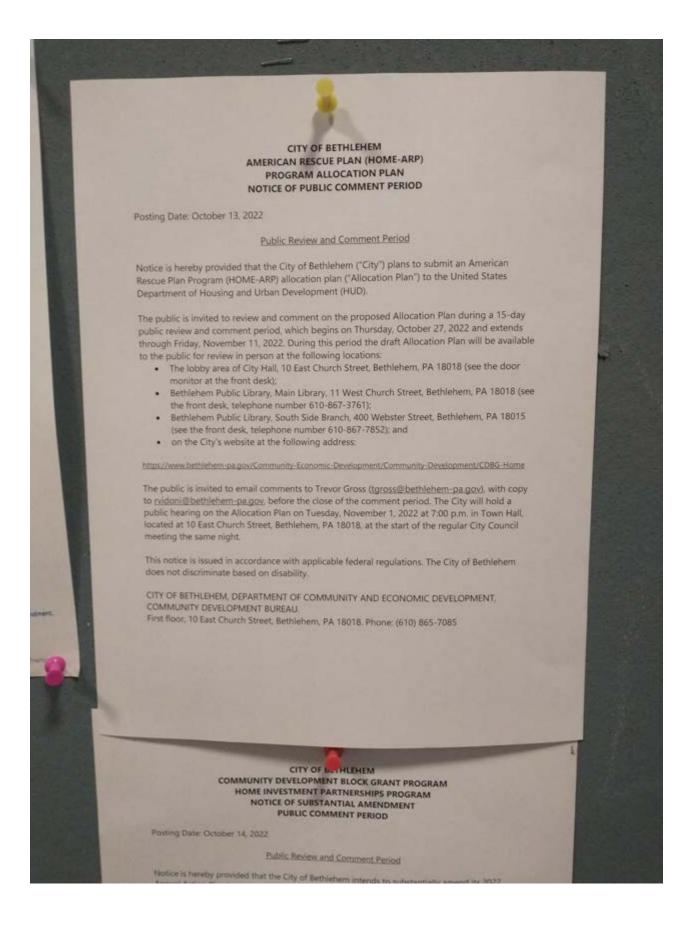


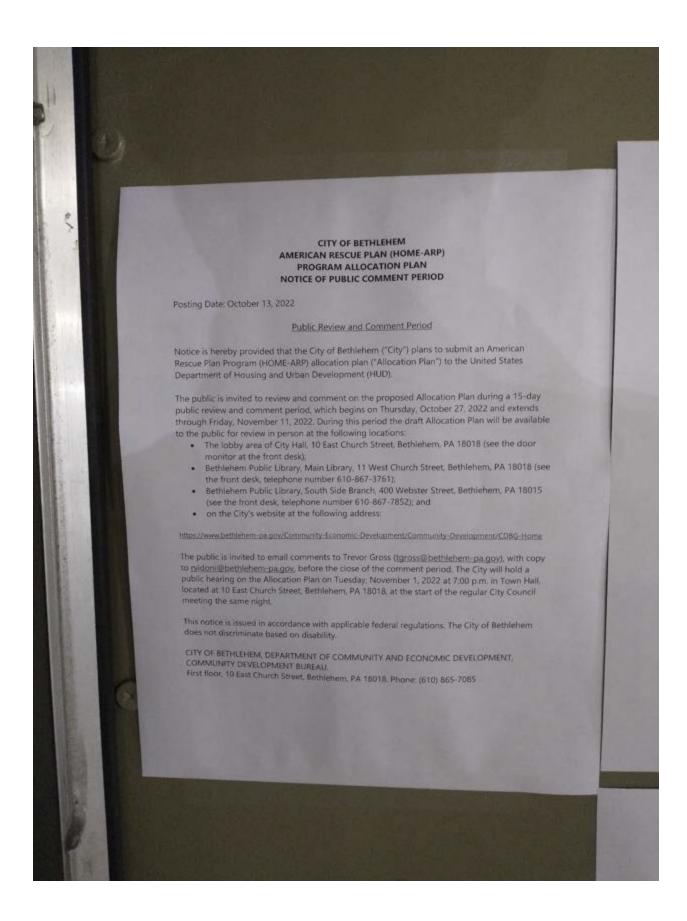




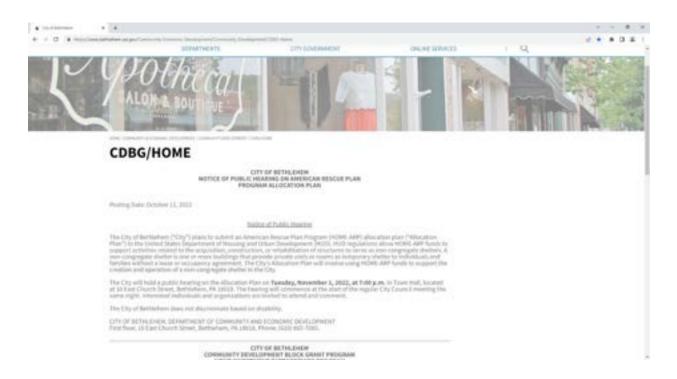


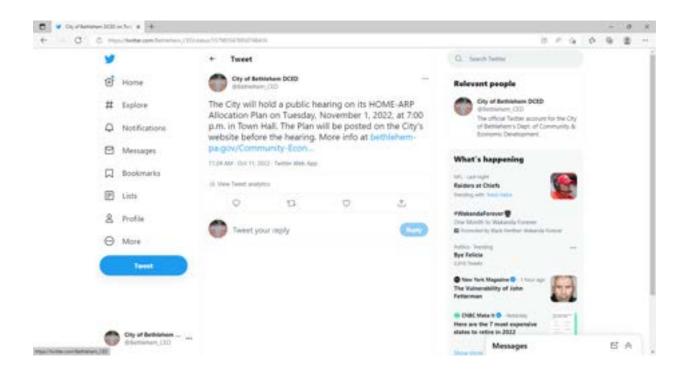


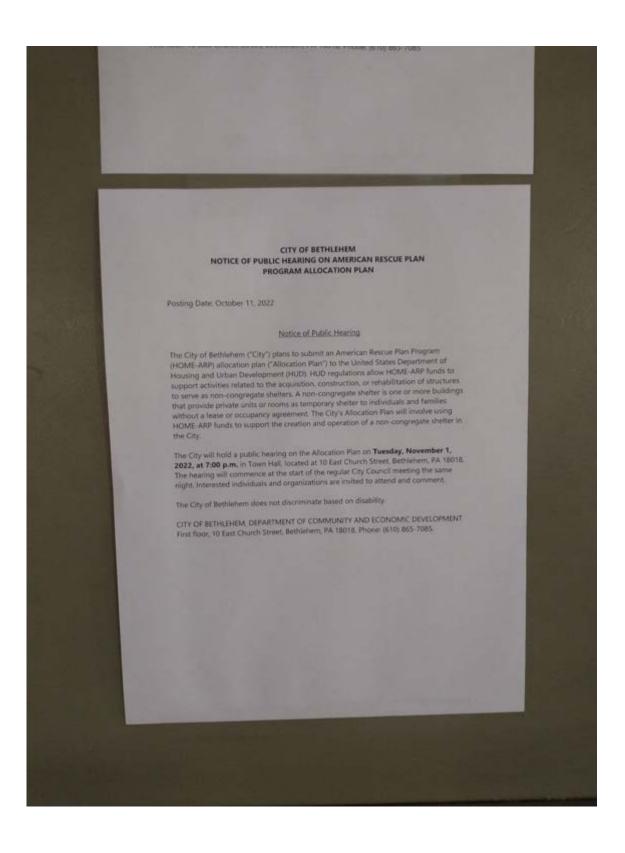


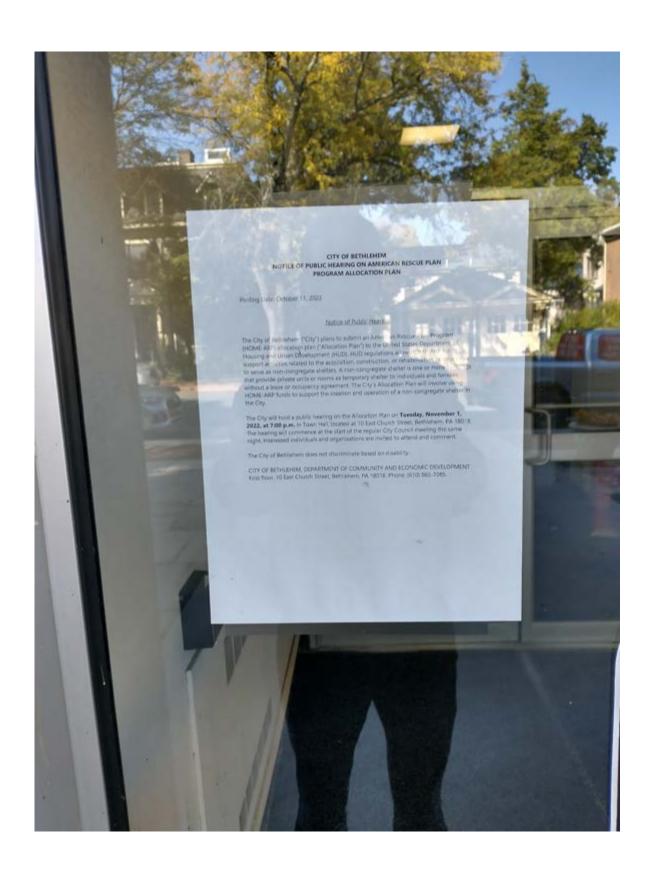


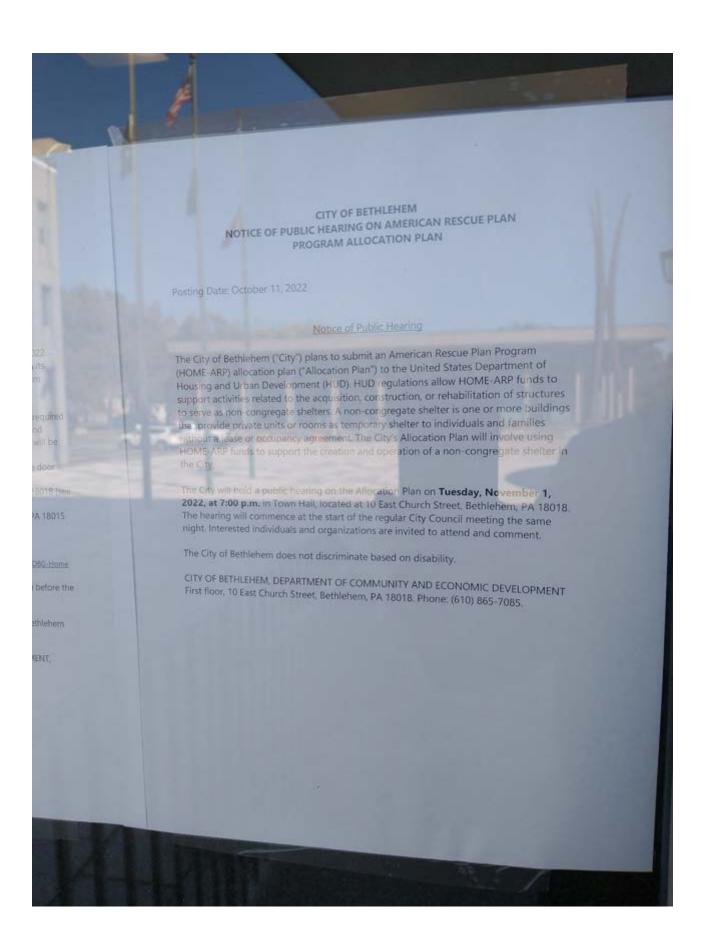
## October 11, 2022 Notice of Public Hearing

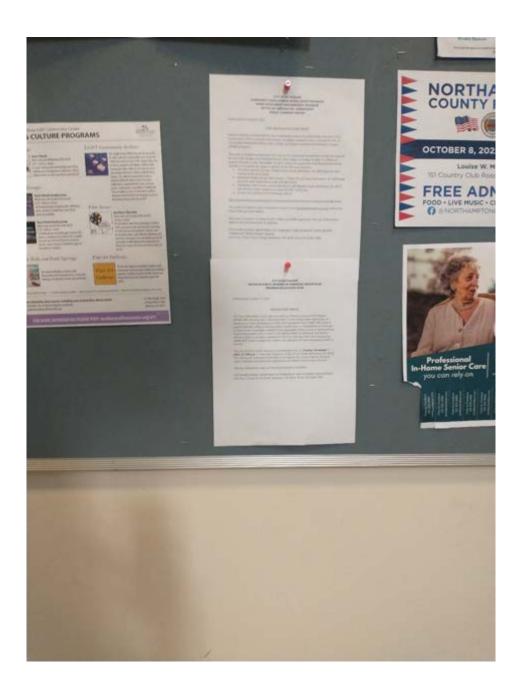


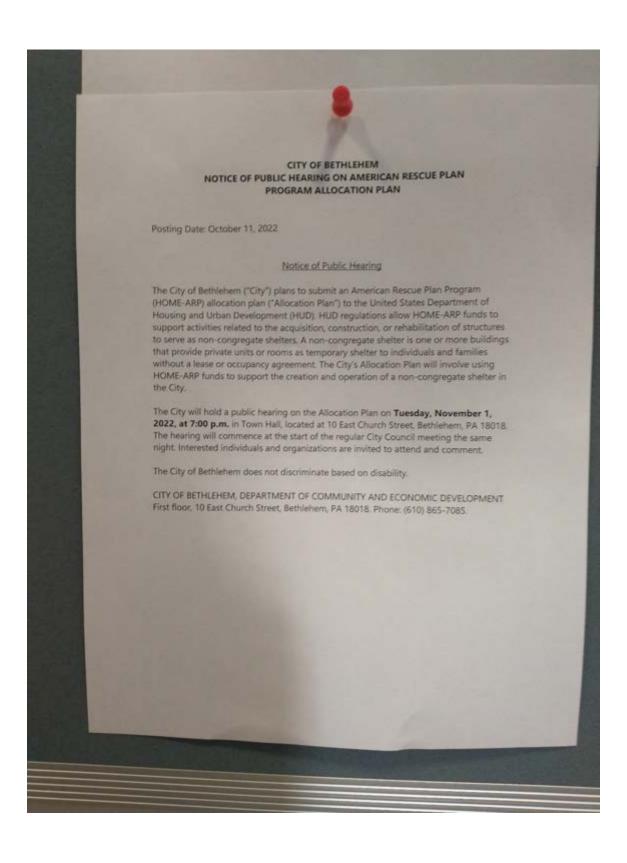




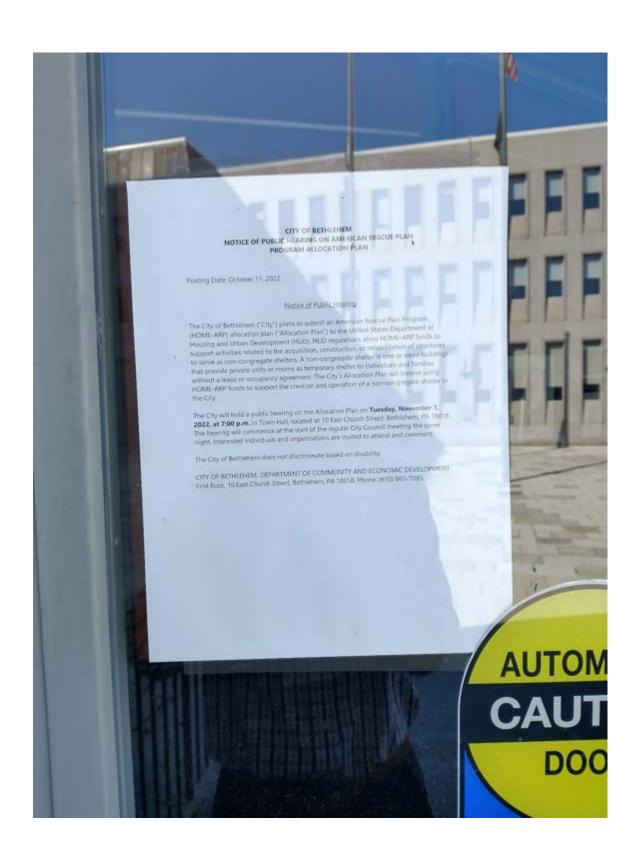












# Appendix 6

# City of Bethlehem City Council Resolution 2023-039

Resolution 2023-39, adopted March 7, 2023, authorized the City of Bethlehem Administration (Mayor) to submit the City's HOME-ARP Allocation Plan to the United States Department of Housing and Urban Development

#### **RESOLUTION NO. 2023-039**

### **HOME-ARP Allocation Plan**

WHEREAS, the U.S. Department of Housing and Urban Development ("HUD") granted the City of Bethlehem, Pennsylvania ("City") \$1,404,987 in American Rescue Plan Program funding ("HOME-ARP Grant") that may be used for the acquisition and development of a noncongregate shelter and the City Administration prepared a HOME-ARP allocation plan ("Allocation Plan") to fund such activity and wishes to submit the plan to HUD for their consideration and approval; and

WHEREAS, the City held public hearings on the Allocation Plan on November 1, 2022, and February 16, 2023, and made the Allocation Plan available for public display and comment, including without limitation at <a href="www.bethlehem-pa.gov">www.bethlehem-pa.gov</a>, during the following public comment periods: October 27, 2022, through November 11, 2022, and February 16, 2023, through March 3, 2023.

NOW, THEREFORE BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF BETHLEHEM:

- 1. That the City's proposed Allocation Plan is hereby approved and authorized for submission to HUD; and
- 2. That the Mayor is hereby authorized to provide the necessary assurances and certifications to submit the Allocation Plan to HUD.

Sponsored by: /s/ Wandalyn J. Enix

/s/ Rachel Leon

ADOPTED by Council this 7th day of March, 2023.

/s/ Michael G. Colón President of Council

ATTEST: /s/ Tad J. Miller City Clerk